



900029768

22.1678
960

REMITTER: WOODLANDS FIFRA-04-2005-3025 (B)

DATE 11/15/05

REDACTED

PAY TO THE
ORDER OF TREASURER, UNITED STATES OF AMERICA
EXACTLY **26,034 AND 23/100 DOLLARS

\$ 26,034.23**OFFICIAL CHECK**

THE PURCHASE OF AN INDEMNITY BOND WILL BE REQUIRED BEFORE
ANY OFFICIAL CHECK OF THIS BANK WILL BE REPLACED OR REFUNDED
IN THE EVENT IT IS LOST, MISPLACED OR STOLEN.

ISSUED BY: TRAVELERS EXPRESS COMPANY, INC.
P.O. BOX 9478 MINNEAPOLIS MN 55480
DRAWEE: US BANK
ST PAUL, MN

DRAWER: PEOPLES BANK & TRUST

⑈0900029768⑈ ⑆096016765⑆

**Exemption 4 - Confidential
Business Information (CBI)**



900029768

REMITTER: WOODLANDS FIFRA-04-2005-3025 (B)

DATE 11/15/05

TREASURER, UNITED STATES OF AMERICA
EXACTLY **26,034 AND 23/100 DOLLARS

\$ 26,034.23

CUSTOMER - FILE COPY

OFFICIAL CHECK

THE PEOPLES BANK & TRUST COMPANY

AUTHORIZED SIGNATURE

NOT NEGOTIABLE

COLLECTION INFORMATION

DEPOSIT (SCHEDULE) NMBR 040 SUSPENSE ☐ LIABILITY ☐

CR NUMBER 2740745P530

REMOVED BY _____

REMOVED DATE _____

BILL NUMBER (IF DIFFERENT FROM CR NBR) _____

IFMS ENTERED DATE: _____

DATE ITEM REC'D (IF NOT CIRCLED ON CHECK) _____

IFMS ENTERED BY: _____

IPACTO: LV RTP HQ

COLLECTION ENTRY PERFORMED BY

ERIC

ACCOUNTING

CR Line	BFY	APPR	Bud Org	BOC	PRC	Site/Proj	AMOUNT	REF. Line
001								
002							45.00	998 401
003							107.82	997
							10778.18	001
								002
								003
								004
								005

WOODLANDS SPECIALISTS, INC.


REFERENCE NO.	DESCRIPTION	INVOICE DATE	INVOICE AMOUNT	DISCOUNT TAKEN	AMOUNT PAID
080107	Docket # FIFRA-04-2007-3018(b)	8/1/2007	10,931.00	0.00	10,931.00

32622

QUALITY MEANS MEETING THE REQUIREMENTS BOX 979077
 SEQ# 006 \$ 0001093100 BA# 27 11-07-07 20 9

Exemption 4 - Confidential
 Business Information (CBI)

Woodlands Specialists, Inc.

 WOODLANDS SPECIALISTS, INC. Hangar 209 Craig Field Selma, Alabama 36701		THE PEOPLE'S BANK & TRUST COMPANY SELMA, ALABAMA 36701	
PAY TO THE ORDER OF United States EPA Region 4 Atlanta Federal Center 61 Forsyth Street Atlanta, GA 30303-8960		CHECK NO. 32622 DATE 10/29/2007 AMOUNT *****10,931.00	32622 10/29/2007 *****10,931.00
THE SUM OF TEN THOUSAND NINE HUNDRED THIRTY ONE DOLLARS			
Signature: <i>[Handwritten Signature]</i>			

Woodlands Specialists, Inc.

Hangar 209 Craig Field

Selma, Alabama 36701

(EPA Est. No. 81198-AL-001)

FIFRA-04-2007- 3018(b)

Establishment Number INACTIVATED on 10/7/05.

MEMORANDUM
OF CALL

Previous editions usable

TO:

Mark Bleeth

☒ YOU WERE CALLED BY ☐ YOU WERE VISITED BY-

OF (Organization)

☒ PLEASE PHONE ☐ FTS ☐ AUTOVON

☐ WILL CALL AGAIN ☐ IS WAITING TO SEE YOU
☐ RETURNED YOUR CALL ☐ WISHES AN APPOINTMENT

MESSAGE

*In regards to a letter
he received from you, he's
tried to reach you several
times,*

RECEIVED BY *AB* DATE *2-6-07* TIME *1:09*

63-110 NSN 7540-00-634-4018

U.S.G.P.O. 1991 281-781/40011

STANDARD FORM 63 (Rev. 8-81)
Prescribed by GSA
FPMR (41 CFR) 101-11.6

REDACTED

Name and Phone Number
Information Redacted pursuant to 5 U.S.C.
Section 552 (b)(6), Personal Privacy

REDACTED

Exemption 7

___ (A) Interference with Enforcement

___ (B) Right to Fair Trial

✓ (C) Unwanted Invasion of Personal



Mark Bloeth/R4/USEPA/US

03/20/2007 10:33 AM

To Fred Burnside/R4/USEPA/US@EPA

cc Stuart Perry/R4/USEPA/US@EPA

bcc

Subject Fw: Import/Export issue in Region 4

Fred,

A bit of an update. , just called me to remind me that come April 1st his lease is up and his intentions are not to further abandon Woodlands' material but to move it for security's sake. I cautioned him on previous calls regarding the potential of assuming liability (even when you are wanting to "do the right thing"). If you or another agent could call him with some advice, it would be appreciated given his anxiety as April 1st approaches. His place of business is where the material is currently being stored on behalf of Woodlands Specialists, Inc.

Mark Bloeth
US EPA Region 4
PCB & Chemical Products
Management Section
61 Forsyth Street, SW
Atlanta, Georgia 30303
(404) 562-9013

— Forwarded by Mark Bloeth/R4/USEPA/US on 03/20/2007 10:25 AM —



Mark Bloeth/R4/USEPA/US

03/20/2007 09:55 AM

To Fred Burnside/R4/USEPA/US

cc Stuart Perry/R4/USEPA/US@EPA

Subject Fw: Import/Export issue in Region 4

Hi Fred,

Just doing a little follow up with you per Jack Cowart (see below). Neither Ted Stanich nor Larry Lamberth contacted me as of yet. I am available if somebody wants access to my file or for discussion.
Thanks.

Mark

— Forwarded by Mark Bloeth/R4/USEPA/US on 03/20/2007 09:52 AM —



Jack Cowart/R4/USEPA/US

03/20/2007 09:42 AM

To Mark Bloeth/R4/USEPA/US@EPA

cc

Subject Re: Fw: Import/Export issue in Region 4

No updates as yet,
but you may wish to get in touch with Fred Burnside, Special Agent in Charge, in EPA's CID.

Jack

Mark Bloeth/R4/USEPA/US



Mark Bloeth/R4/USEPA/US
03/19/2007 01:58 PM

To Jack Cowart/R4/USEPA/US@EPA
cc
Subject Fw: Import/Export issue in Region 4

Hey Jack,

Any updates regarding these issues ? Woodlands has not contacted me (since Feb 6th) about my outstanding FIFRA matter. Just curious.

Mark

—— Forwarded by Mark Bloeth/R4/USEPA/US on 03/19/2007 01:56 PM ——



Jack Cowart/R4/USEPA/US
03/01/2007 10:27 AM

To Mark Bloeth/R4/USEPA/US@EPA
cc Jack Cowart/R4/USEPA/US@EPA
Subject Fw: Import/Export issue in Region 4

Mark:

Your issue is expanding. EPA Region 4 CID is now involved and will contact Homeland Security.

Jack

—— Forwarded by Jack Cowart/R4/USEPA/US on 03/01/2007 10:23 AM ——

Fred Burnside /R4/USEPA/US
03/01/2007 09:12 AM

To Larry Lamberth/R4/USEPA/US@EPA, Ted Stanich/DC/USEPA/US@EPA
cc cowart.jack@epa.gov, Ivan Vikin/R4/USEPA/US@EPA, Jack Cowart/R4/USEPA/US@EPA, kumar.narindar@epa.gov, lamberth.larry@epa.gov
Subject Re: Fw: Import/Export issue in Region 4

Larry, I plan to forward this message to our Homeland Security group in D.C. Thanks and I assume someone in the HS group can call Mark B.

Ted, would you please have someone in your group take a look at the original e-mail and respond to either myself or Mark Bloeth.

Fred Burnside, SAC
Atlanta Area CID Office
404-562-9809 office
404-592-7907 cell

Larry Lamberth/R4/USEPA/US



Larry
Lamberth/R4/USEPA/US
02/28/2007 04:58 PM

To Jack Cowart/R4/USEPA/US@EPA, Fred
Burnside/R4/USEPA/US@EPA, Ivan
Vikin/R4/USEPA/US@EPA
cc cowart.jack@epa.gov, kumar.narindar@epa.gov,
lamberth.larry@epa.gov
Subject Re: Fw: Import/Export issue in Region 4

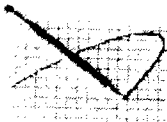
We should refer this to CID.

It bothers me that the original e-mail is old.

LLL

Larry Lamberth
Acting Chief, South Enforcement and Compliance Section
RCRA and OPA Enforcement and Compliance Branch
RCRA Division

404-562-8590
fax: 404-5692-8566
Jack Cowart/R4/USEPA/US



Jack Cowart/R4/USEPA/US
02/28/2007 09:52 AM

To lamberth.larry@epa.gov, kumar.narindar@epa.gov
cc cowart.jack@epa.gov
Subject Fw: Import/Export issue in Region 4

-----Forwarded by Jack Cowart/R4/USEPA/US on 02/28/2007 09:51AM -----

To: heiss.robert@epa.gov
From: Jack Cowart/R4/USEPA/US
Date: 02/28/2007 09:45AM
cc: cowart.jack@epa.gov
Subject: Import/Export issue in Region 4

Bob:

We have an import/export issue here in Region 4 that has already involved Customs and may involve Homeland Security. The Region 4 FIFRA person has provided a very brief summation of the issue which

is included below. The fact that the company appeared to intend to export 10,000 pounds of ammonium nitrate causes me some concern when viewed in the context of potential use in IEDs in Iraq and/or Afghanistan.

My question is what action should we take under import/export?

Jack

Hi Jack,

Would you call or email me with your insight about the below scenario. I have some new information I also wanted to discuss. Thanks.

Mark Bloeth
US EPA Region 4
PCB & Chemical Products
Management Section
61 Forsyth Street, SW
Atlanta, Georgia 30303
(404) 562-9013

----- Forwarded by Mark Bloeth/R4/USEPA/US on 02/28/2007 08:05 AM -----

**Brian
Gross/R4/USEPA
/US**

12/14/2006 10:35
AM

To Mark Bloeth/R4/USEPA/US@EPA

cc Jack Cowart/R4/USEPA/US@EPA

Subject Fw: Potential RCRA issue

Mark,

I am forwarding this to Jack Cowart who deals with import/export issues.

Thanks,

Brian G.
x28604

----- Forwarded by Brian Gross/R4/USEPA/US on 12/14/2006 10:34 AM -----

**Mark
Bloeth/R4/USEP
A/US**

12/12/2006 08:51

To Brian Gross/R4/USEPA/US@EPA

REDACTED

AM

cc Anthony Toney/R4/USEPA/US@EPA

Subject Potential RCRA issue

Hi Brian,

I have a long-standing importation & storage issue regarding pesticides and fertilizers. The responsible party is Woodlands Specialists, Inc., who was a previous Respondent in an EPA Region 4 civil matter pertaining to FIFRA (pesticides law).
I'll be brief ...

- In June 2004, Woodlands imported 1,000kg of metsulfuron methyl 60% (unregistered pesticide) for repackaging and intended export.
- This US Customs temporary importation entry was bonded (TIB #AM304087035) with export or destruction required by 6/3/2005.
- US Customs (Fines, Penalties & Forfeitures) fined Respondent for failure to export or destroy.
- At EPA's direction, the Alabama Dept. of Agriculture & Industries inspected the material in March 2006.
- The 1,000kg of metsulfuron methyl have been repackaged into 151 cases in (4)-1Gallon containers per case.
- ADAI also documented the storage of about 100 gallons of Atrazine 4L, (200)-50LB bags of 13-13-13 fertilizer, and (200)-50LB bags of Ammonium Nitrate 34-0-0 (explosive ?) also with apparent export intentions but with no action.
- EPA Region 4 has received repeated calls from

where Woodlands material is being stored and to whom Woodlands reportedly has incurred storage fees. It feels that Woodlands has essentially abandoned the products at his place of business. His feeling from US Customs is that since they have already levied fines against Woodlands, the storage issue is kind of out of their hands.

I also intend to make contact with US Customs on this matter to explore whether they have truly exhausted all enforcement remedies. Any insight you can provide or forwarding to a more appropriate program person would be appreciated.

Mark Bloeth
US EPA Region 4
PCB & Chemical Products
Management Section
61 Forsyth Street, SW
Atlanta, Georgia 30303
(404) 562-9013
(404) 562-8973 - Fax

Information Redacted Pursuant to U.S.C.
Section 552 (b)(6), Personal Privacy

Exemption 7

- ___ (A) Interference with Enforcement Proceedings
- ___ (B) Right to Fair Trial
- ☒ (C) Unwanted Invasion of Personal Privacy

REDACTED

PESTICIDE PRODUCER ESTABLISHMENT INSPECTION
EPA REFERRAL

CASE NUMBER: 06022

EPA REFERRAL NUMBER: 037-AL-06

DATE OF INSPECTION: March 7, 8, 9, 10, 14 & 16, 2006

PRODUCER: Woodland Specialists, Inc.
Hangar 209 - Craig Field
Selma, Alabama 36701
(334) 872-6001
EPA Est. Number: 81198-AL-01

IMPORT/EXPORT SHIPPER: Shippers Express
2450 Pinson Valley Parkway
Birmingham, Alabama 35217
(205) 849-0093

changed to:
2244 Pinson Valley

Jensen Shipping Company, Inc.
244 West Valley Avenue, Suite 205
Birmingham, Alabama 35202
(205) 324-4253

Cooper/T. Smith Stevedoring
118 North Royal Street (P.O. Box 1566)
Mobile, Alabama 36633 (36602-3603)
(251) 431-6100

CUSTOMHOUSE BROKER: Carole C. Leland, CHB
244 West Valley Avenue, Suite 205
Birmingham, Alabama 35202
(205) 328-2343

U. S. CUSTOMS: U. S. Customs and Border Protection
150 N. Royal Street, Suite 3004 (P.O. Box 2748)
Mobile, Alabama 36602 (36652)
(251) 441-6158

U. S. Customs and Border Protection
950 22nd Street, Suite 550 (P.O. Box 320127)
Birmingham, Alabama 35203 (35212)
(205) 731-1464
Alabama State Docks - Billing

STATE DOCKS:

State Docks Blvd.
Mobile, Alabama 36633
(251) 441-7043

(P.O. Box 1588)
(36602-3603)

REASON FOR INSPECTION: For Cause - EPA Referral inspection of records, pesticide products packaging and labeling, facilities, finished product storage areas, production facilities, equipment, methods, etc. of an EPA pesticide producer establishment, two import/export shippers, a customhouse broker, two U.S. Customs offices and the Alabama State Docks (Mobile).

CREDENTIALS AND RESPONSIBILITIES

On March 7, 8, 9, 10, 14 & 16, 2006, as part of a U.S. Environmental Protection Agency Referral inspection, Dalton Brown and I visited the premises of the above listed companies and agencies. We identified ourselves as agents of the Commissioner of the Alabama Department of Agriculture & Industries by presenting our credentials to the most responsible person at each location. A *Notice of Inspection* was issued, and we explained the reason for our visit. A *Sample Collection Report* was completed and signed for all samples taken. *Official Statements*, photographs and copies of records were collected where appropriate. All parties contacted during this investigation were cooperative.

POTENTIAL VIOLATION(S) FOUND

During the Producer Establishment Inspection at Woodland Specialists, Inc., the following potential violation(s) were noted:

1. The company did not produce the Section 7 (Production) Report for 2004 or 2005 for inspection. It is suspected that the repackaging of the product imported into the Birmingham Port was not reported on either the 2004 or 2005 production reports.

SAMPLES

Two (2) documentary samples were collected from Shipper's Express, Inc., consisting of photographs of the repackaged containers, and any labeling printed on or affixed to the containers and packaging of the unregistered imported pesticide product awaiting export at the import/export company.

Sample #03070601010101 is a documentary sample of *metsulfuron methyl 60% WDG*, consisting of photographs of the container and labeling of the product as it appears on the product that is packaged, labeled and released for export on 121 of 151 cases (4 - 1 gals/case). The 121 cases were repackaged (the case box was changed) at Shipper's Express (Birmingham) to meet Custom's specifications.

Sample #03070601010102 is a documentary sample of *metsulfuron methyl 60% WDG*, consisting of photographs of the container and labeling of the product as it appears on the container that is packaged, labeled and released for export on 30 cases (4 - 1 gals/case). The labeling on the case boxes was changed by placing a "Marine Pollutant" sticker over

the words "Made in U.S.A."

The photographs were marked with the sample number for identification purposes, and are attached to this inspection report for further review.

SUMMARY

The Agency's Referral request required investigation into areas not specifically addressed by our (ADA&I) current established inspection protocols for EPA Producer Establishments; therefore, the standard report forms and narrative macro did not always appear suitable or adequate to report the findings. A non-protocol inspection form was created and used for import/export shippers, U.S. Customs and Alabama State Docks contacts, and the narrative format was changed to limit the report to addressing only the requested issues.

The problems documented during the investigation appear to involve more U.S. Customs issues than potential FIFRA violations.

Issue 1: Is the product currently held for export at Shipper's Express (Birmingham) a portion of the same product as covered under FIFRA-04-2005-3025(b)?

Collected copies of disposal records (Exhibit C) appear to show that the 120 -25 kg cardboard drums of Metsulfuron Methyl 60% WDG and Sulfometuron-Methyl 75% WDG were repackage by Woodland Specialists into 16 - 55 gallon drums and transported to C-MAC Environmental Group, Inc. (Glencoe, Alabama) for disposal. The collected records contain a written statement from C-MAC stating that they have received and disposed of the shipment. A copy of a "Notice of Arrival of Pesticides and Devices" (Exhibit D) appears to show the arrival of 40 -25 kg drums of Metsulfuron Methyl 60% WDG from China via Air China at the Birmingham Airport on June 9, 2004. The two exhibits appear to show that these are separate shipments of imported unregistered pesticide.

Issue 2: How do the two import shipments differ?

The import shipments addressed by FIFRA-04-2005-3025(b) were described as "returned goods" when imported, but they had not been produced in the United States. They were in fact shown to have been produced in China, and were not registered for use in the United States. The Shipment currently held at Shipper's Express (Birmingham) was imported under a "Temporary Import Bond" (T.I.B.), and was clearly identified to U.S. Customs as unregistered pesticide for "processing and export only" (see the attached "Notice of Arrival of Pesticides and Devices" (Exhibit D).

Issue 3: Where was the product (currently held at Shipper's Express) repackaged for export (where did production occur)?

The "Notice of Arrival of Pesticides and Devices" (Exhibit D) and the "Shipper's Declaration For Dangerous Goods" (Exhibit E) shows that the product came into the United States packaged in 40 - 25 KG fibre drums. The granular product was then

repackaged at Woodland Specialists (Selma) into 604 - 1 gallon unlabeled white plastic jugs which were then packaged into 151 brown cardboard case boxes (4 - 1 gallons per box). The case boxes were stenciled with the wording that indicated the contents "4 - 1 Gals." and the erroneous statement "Product of the United States." Woodland Specialists also affixed a sticker which identified the product as "Metsulfuron Methyl 60%" and indicated "Not for Sale in the U.S.A." The product was then delivered to Shipper's Express (Birmingham) for export.

Issue 4: Why has the product not been exported?

The shipment was released for processing under "Temporary Import Bond" (T.I.B.) in June of 2004 (see Exhibit F - Custom's "Entry/Immediate Delivery" form). [A T.I.B. is good for one year, but the importer has an option to apply for up to two additional extensions of one year each.] The current T.I.B. expired in June of 2005, and the importer has not applied for an extension as of March 14, 2006. Customs has cited the importer on at least two occasions (see Exhibit G & H), and assessed a considerable fine on the second occasion. Customs has the power to seize the product, however they are reluctant to do so because of the substantial costs involved with disposal. As a condition to allowing the product to enter the country, U.S. Customs required an "Export Exam." Customs inspectors took issue with the repackaged product because it was labeled as a "Made in U.S.A.," (which they viewed as a fraudulent statement), and since the product was intended to be exported aboard a ship, it was required to be labeled as a "marine pollutant." These issues were addressed by replacing the case boxes with new case boxes on 121 of the cases of product and by affixing an approved "Marine Pollutant" sticker to all of the cases. On 30 of the cases it was decided, with a U.S. Customs Agent's approval, to place the "Marine Pollutant" sticker over the "Made in U.S.A." stencil. The repackaging was accomplished by employees of Woodland Specialist with the assistance of employees of Shipper's Express at the Birmingham location. The current issue that has not yet been resolved relates to a form that must be completed by Leigh Allen, President of Woodland Specialist, known as the "Shipper's Declaration For Dangerous Goods." The Customhouse Broker, Carole Leland, has supplied a blank form to Mr. Allen, but a satisfactory completed form has not yet been submitted to the export agent, Jensen Shipping Company. The export issue has further been complicated by Woodland Specialists addition of 20 cases (2 - 2.5 gallons) of AgriSolutions Atrazine 4L (EPA Reg #1381-158), 200 - 50# bags of 13-13-13 fertilizer and 200 - 50# bags of Ammonium Nitrate 34-0-0 to the planned export shipment on January 9, 2006 (see Exhibit K). The export shipper is of the opinion that the ammonium nitrate may be viewed as an explosive. Kaj Jensen, president of Jensen Shipping Company, had hoped to include the items in a shipping container that was to be placed on a ship with the ultimate destination of Tema, Ghana, but all of the issues must be resolved before the shipment.

Issue 5: Does the labeling of the product meet FIFRA requirements?

The labeling of the product or more correctly the lack of labeling does not appear to be in compliance with FIFRA and CFR Part 156 labeling requirements for a domestic pesticide product (for use in the U.S.), but may comply with the wishes of the importing country, Ghana. The only available information regarding the wishes of the importing country are covered in a memo collected from the export shipper, Jensen Shipping. The memo (Exhibit I) appears to document the wishes of, but does not specify any labeling requirements. It appears that if the product clears U.S. Customs inspectors and transport vessel requirements, then the labeling or lack of labeling meets the specifications (or lack of specifications) of the importing country.

Issue 6: A secondary issued arose in reviewing the records at the export shipper, Jensen Shipping and Carole Leland, CHB. A copy of a memo (Exhibit J) dated June 21, 2004 alleged to be from Leigh B. Allen to Mr. Lee Furse, EPA Pesticide, appears to indicate that Woodland Specialists planned to import 2500 kgs of 2,3-Pyridinedicarboxylic Acid 60% (believed to be either a pesticide active ingredient or intermediate). According to the memo, the import of the product was alleged to be handled by Cooper/T. Smith (Mobile). Cooper/T. Smith, U.S. Customs (Mobile) and the Alabama State Docks were contacted regarding any possible imports by Leigh Allen or Woodland Specialists during 2004-06. The company and agencies found no records of any imports by either the person or company. Lacking further evidence of the import, Mr. Allen was not contacted regarding the alleged transaction.

Producer Records: President, Leigh B. Allen, was requested to produce his Section 7 (Production Report) for inspection along with all records involving the product currently held at Shipper's Express (Birmingham). Mr. Allen produced all requested records except the requested Section 7 Report. When ask if he could produce the record, he responded that his secretary was not present, and he did not know where to look for the record.

Additional records not previously cited in this report were also collected from both Woodland Specialties and from Jensen Shipping. One or more of the records may be of interest, so they are attached to this report as Exhibit L and Exhibit M.

ATTACHMENTS

Narrative Report

Pesticide Producer Establishment Inspection Report (Shipper's Express)

Pesticide Producer Establishment Inspection Report (Woodland Specialists)

Import/Export Agent Inspection Report (U.S. Customs - Birmingham)

Import/Export Agent Inspection Report (Carole Leland, CHB)

Import/Export Agent Inspection Report (Jensen Shipping)

Import/Export Agent Inspection Report (Cooper/T. Smith)

Import/Export Agent Inspection Report ((U.S. Customs - Mobile)

Import/Export Agent Inspection Report (Alabama State Docks)

03/07/06)

with 3 page handwritten attachment (Exhibit A -

Official Statement of Leigh B. Allen (Exhibit A - 03/09/06)

Exc: otion 7

— (A) Interference with Enforcement Proceedings

— (B) Right to Fair Trial

☒ (C) Unwanted Invasion of Personal Privacy

Sample Collection Report

Documentary Sample #03070601010101

Documentary Sample #03070601010102

Digital Photo CD

Copies of disposal records (Exhibit C)

Copy of Notice of Arrival (Exhibit D)

Copy of Shipper's Declaration for Dangerous Goods (Exhibit E)

Copy of Custom's Entry/Immediate Delivery form (Exhibit F)

Copy of Custom's Notice of Penalty dated 07/20/05 (Exhibit G)

Copy of Custom's Notice of Penalty dated 09/26/05 (Exhibit H)

Copy of memo of acceptance from importer (Ghana) (Exhibit I)

Copy of memo to EPA from Leigh Allen (Exhibit J)

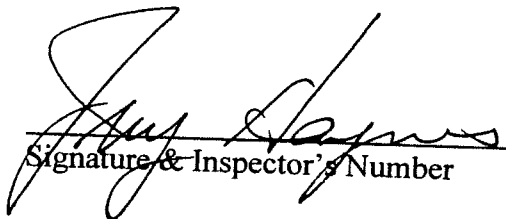
Copies of other records collected at Woodland Specialists (Exhibit L)

Copies of other records collected at Jensen Shipping (Exhibit M)

Notice of Inspections

Jerry Haynes — ACPS

Inspector's Name & Title

 #0101
Signature & Inspector's Number

Information Redacted pursuant to 5 U.S.C.
Section 552 (b)(6), Personal Privacy

Exemption 7

- ☐ (A) Intertarence with Enforcement Proceedings
- ☐ (B) Right to Fair Trial
- ☒ (C) Unwanted Invasion of Personal Privacy

INVESTIGATION
MANAGEMENT
201 & INC.

RECEIVED
PESSTION
MANAGEMENT
APR 18 1903



STATE OF ALABAMA
DEPARTMENT OF AGRICULTURE & INDUSTRIES
OFFICIAL STATEMENT

File No.
(If applicable) **CASE #06022**
EXHIBIT A

State
ALABAMA

County
DALLAS

City
SELMA

I, LEIGH B. ALLEN IN THE PRESENCE OF JERRY HAYNES
Inspector for the Alabama Department of Agriculture and Industries do hereby make the following statement:

I AM THE MANAGER OF WOODLAND SPECIALISTS, INC., HANGAR 209 CRAIG FIELD, SELMA, ALABAMA 36701. I AM TOTALLY RESPONSIBLE FOR THE OPERATIONS OF THIS FIRM.

C-MAC ENVIRONMENTAL GROUP, INC., 402 WEBSTER CHAPEL ROAD, GLENCOE, ALABAMA 35905, ACKNOWLEDGED RECEIPT OF SIXTEEN (16) DRUMS OF HAZARDOUS WASTE FROM WOODLANDS SPECIALISTS, INC., HANGAR 209 CRAIG FIELD, SELMA, ALABAMA 36701 ON AUGUST 12, 2005 VIA SKELTON TRUCKING, LLC. C-MAC CERTIFIED THAT THE PRODUCT HAD BEEN DISPOSED OF IN A MEMO DATED 09/02/05. OUR COMPANY WAS REQUIRED TO REPACKAGE THE 120 CONTAINERS CONSISTING OF 25 KG PAPER AND WOODEN DRUMS OF METSULFURON METHYL AND SULFOMETURON METHYL INTO THE 16 - 55 GALLON POLY DRUMS PRIOR TO SHIPMENT FOR DISPOSAL. I HAVE PROVIDED COPIES OF THE STATE MANIFEST (DOCUMENT NUMBER - "C-MAC 241768" DATED 08/12/05 AND THE "CERTIFICATION OF DISPOSAL" DATED 09/02/05. I CERTIFY THAT THE COPIES REPRESENT TRUE COPIES OF ACTUAL RECORDS HELD ON FILE AT THIS LOCATION.

ON JUNE 9, 2004 40 - 25 KG FIBRE DRUMS OF METSULFURON METHYL 60% ENTERED THE UNITED STATES VIA AIR CHINA THROUGH THE BIRMINGHAM AIRPORT (ENTRY #AM3-0408703-5) FROM JIANGSU CHANGLONG CHEMICALS CO, LTD, LONGHU TANG, NEW DISTRICT OF CHANGZHOU, JIANGSU, P.R. CHINA (EPA ESTABLISHMENT #74134-CHN-001). THE PRODUCT WAS REPORTED AS "T.I.B. FOR PROCESSING AND EXPORT ONLY." WE REPACKAGED THE METSULFURON METHYL 60% INTO 1 GALLON POLY JUGS [604 INDIVIDUAL JUGS PACKAGED IN 151 CARDBOARD BOX CASES (4/CASE)] FOR EXPORT TO NEKOTECH CENTER TEMA BRANCH A/31 PAA GRANT CLOSE, PO BOX 77, OPPOSITE COURTESY INTERNATIONAL HOTEL COMMUNITY 10 TEMA GHANA WEST AFRICA 233-2230-6363 (p) ATT: PRINCESS ASIE OCANSEY. THE PRODUCT WAS TO BE EXPORTED IN LATE 2005, BUT VARIOUS DELAYS HAVE PREVENTED THE SHIPMENT. OUR CUSTOMHOUSE BROKER, CAROLE LELAND, P.O. BOX 11146, BIRMINGHAM, ALABAMA 35202, CONTRACTED THROUGH JENSEN SHIPPING COMPANY, INC. 244 WEST VALLEY AVENUE, BIRMINGHAM, ALABAMA 35209 TO SHIP THE PRODUCT. WE WERE INSTRUCTED TO DELIVER THE PRODUCT TO SHIPPER'S EXPRESS (BIRMINGHAM) WHERE IT WAS TO BE INCLUDED IN A 40 FOOT CONTAINER BOUND FOR TEMA, GHANA. A PROBLEM AROSE REGARDING SOME OF THE PACKAGING (CARDBOARD BOX CASES), SO WE PURCHASED ADDITIONAL PACKAGING, AND WITH THE ASSISTANCE OF SHIPPER'S EXPRESS EMPLOYEES WE REPACKAGED MOST OF THE CASES. WE BELIEVE THAT THE PACKAGING PROBLEM HAS NOW BEEN RESOLVED, AND THE PRODUCT IS READY FOR SHIPMENT. I HAVE FURNISHED COPIES OF THE "SHIPPER'S DECLARATION" AND "NOTICE OF ARRIVAL" DOCUMENTING RECEIPT OF THE PRODUCT, AND COPIES OF RECORDS AND CORRESPONDENCE RELATING TO OUR ATTEMPTS TO EXPORT THE METSULFURON METHYL (INCLUDING A CUSTOMS ASSESSMENT OF A FINE FOR RETAINING THE MATERIAL BEYOND THE ONE YEAR LIMIT FOR T.I.B. IMPORTED PRODUCTS). I CERTIFY THAT ALL COPIES FURNISHED REPRESENT TRUE COPIES OF ACTUAL RECORDS HELD ON FILE AT THIS LOCATION.

I hereby certify that I have read the above statement and it is true and correct.

SIGNATURE

PRESIDENT

TITLE

FIRM/INDIVIDUAL Name and address (Zip Code)

WOODLAND SPECIALIST, INC., HANGAR 209 - CRAIG FIELD, SELMA, ALABAMA 36701

I hereby certify this statement was made and signed by LEIGH B. ALLEN

and in my presence on this 8th day of

MARCH 2006

#0101

Signature of Inspector

Original - Department
1. Establishment
2. Inspector



Hangar 209 Craig Industrial Park Selma, Alabama 36701
Phone: (334) 872-6001 Fax: (334) 874-3948

November 15, 2005

U.S. Environmental Protection Agency
Cincinnati Accounting Operations
Mellon Lockbox 371099M
Pittsburgh, PA 15251-7099

To Whom It May Concern:

Attached is a certified check for final payment with regard to the Consent Agreement and Final Order for Woodlands Specialists, Inc., FIFRA-04-2005-3025(b).

Sincerely,

Cc: Regional Hearing Clerk
U.S. EPA - Region 4
61 Forsyth St.
Atlanta, GA 30303

Mr. Mark D. Bloeth (APT-PS)
U.S. EPA - Region 4
61 Forsyth St.
Atlanta, GA 30303

Ms. Saundi Wilson
Environmental Accountability Division
U.S. EPA - Region 4
61 Forsyth St.
Atlanta, GA 30303

RECEIVED
EPA REGION IV
2005 NOV 18 PM 2:59
HEARING CLERK



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

SEP 12 2005

4APT-PS

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Leigh B. Allen
President
Woodlands Specialists, Inc.
Hangar 209 Craig Field
Selma, Alabama 36701

SUBJ: Docket No. FIFRA-04-2005-3025(b)
Woodlands Specialists, Inc.

Dear Mr. Allen:

Enclosed is a copy of the ratified Consent Agreement and Final Order (CAFO) in this matter. The original CAFO has been filed with the Regional Hearing Clerk and served on the parties as directed in Section 22.6 of the Consolidated Rules of Practice, 40 CFR Part 22.

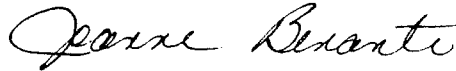
Please forward your payment via a cashier's check for **\$26,000** within 30 days of the filing the CAFO. We request that the payment be identified by writing **FIFRA-04-2005-3025(b)** on the face of the check. The check should be made payable to the Treasurer, United States of America and sent on or before the due date to:

U.S. Environmental Protection Agency
Cincinnati Accounting Operations
Mellon Lockbox 371099M
Pittsburgh, PA 15251-7099.

Also enclosed, please find a copy of the October 2001 *Enforcement Alert* titled "U.S. EPA Notifying Defendants of Securities and Exchange Commission's Environmental Disclosure Requirements." This document puts you on notice of your potential duty to disclose to the Securities and Exchange Commission (SEC) any environmental enforcement actions taken by the EPA. If you have any questions with regard to the SEC's environmental disclosure requirements, you may refer to the contact phone number on page three of the Notice.

Penalty payment questions should be directed to Ms. Peggy Whitney at the letterhead address or by telephone at (404) 562-8238. Should you have any questions about your company's compliance status in the future, please do not hesitate to call me or Mark Bloeth at (404) 562-9013.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joanne Benante".

Joanne Benante
Chief
Pesticides and Toxic
Substances Branch

Enclosures

cc: Dr. Patrick Morgan (ADAI)

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
ATLANTA, GEORGIA

In the Matter of:)

Woodlands Specialists, Inc.)

Respondent.)

Docket No. FIFRA-04-2005-3025(b)

RECEIVED
EPA REGION IV
2005 SEP 12 PM 2:32
HEARING ROOM

CONSENT AGREEMENT AND FINAL ORDER

I. Nature of the Action

1. This is a civil penalty proceeding pursuant to the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, 7 U.S.C. §§ 136 *et seq.* (hereinafter "FIFRA"), and pursuant to the Consolidated Rules of Practice Governing Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (Consolidated Rules), 40 CFR Part 22. Complainant is the Director of the Air, Pesticides and Toxics Management Division, United States Environmental Protection Agency, Region 4 (EPA). Respondent is Woodlands Specialists, Inc., Hangar 209 Craig Field, Selma, Alabama 36701.
2. Complainant and Respondent have conferred for the purpose of settlement pursuant to 40 CFR § 22.18 and desire to resolve this matter and settle the allegations described herein without a formal hearing. Therefore, without the taking of any evidence or testimony, the making of any argument, or the adjudication of any issue in this matter, and in accordance with 40 CFR § 22.13(b), this Consent Agreement and Final Order (CAFO) will simultaneously commence and conclude this matter.

II. Preliminary Statements

3. The authority to take action under Section 14(a) of FIFRA, 7 U.S.C. § 136l(a), is vested in the Administrator of EPA. The Administrator of EPA has delegated this authority under FIFRA to EPA Region 4 by EPA Delegation 5-14 dated May 11, 1994.
4. Pursuant to 40 CFR § 22.5(c)(4) the following individual represents EPA in this matter and is authorized to receive service for EPA in this proceeding:

Mark D. Bloeth
APT-PS
U.S. EPA - Region 4
61 Forsyth Street
Atlanta, GA 30303
(404) 562-9013.
5. Respondent is Woodlands Specialists, Inc., a Delaware corporation, located at Hangar 209 Craig Field, Selma, Alabama 36701.
6. Respondent is a registered pesticide producing establishment identified by EPA Est. No. 81198-AL-001.
7. Respondent is a "person" as defined by Section 2(s) of FIFRA, 7 U.S.C. § 136(s), and as such is subject to FIFRA and the regulations promulgated thereunder.
8. On or about November 11, 2004, Respondent submitted a Notice of Arrival of Pesticides and Devices form to EPA for the release of (60)-25 kg. drums of "FreeGrow Mustang

Metsulfuron Methyl DF" (EPA Reg. No. 81198-2) originating from China but misidentifying the EPA Producer Establishment Number for this pesticide as "81198-AL-001".

9. The aforementioned shipment (Entry No. ES2-0038203-5) originated from the Port of Shanghai on the ocean vessel "Lingyunhe 062E" and arrived at the Port of Long Beach, California on or about November 11, 2004.
10. On April 4, 2005, counsel for the Respondent initiated contact with EPA Headquarters and EPA Region 4 to disclose a problem with the November 11, 2004, shipment and inform EPA that the shipment was being held in a secure location, segregated from other products pending EPA approval.
11. On May 3, 2005, EPA Region 4 requested the Alabama Dept. of Agriculture and Industries (ADAI) to conduct an import inspection at Respondent to investigate information provided by Respondent that Respondent was importing pesticides from an unapproved Chinese source for use in the formulation of registered pesticides.
12. On May 24, 2005, an import inspection was conducted by the Alabama Department of Agriculture and Industries (ADAI) at Respondent's facility. As an authorized representative of EPA, ADAI documented and collected records pertaining to a combined shipment of (120)-25kg. drums of "Metsulfuron-Methyl 60%" and "Sulfometuron-Methyl 75%" from China and received by Respondent in December of 2004.
13. "Metsulfuron-Methyl 60%" and "Sulfometuron-Methyl 75%" are "pesticides" as defined in Section 2(u) of FIFRA, 7 U.S.C. § 136(u), which includes any substance or mixture of substances intended for preventing, destroying, repelling, or mitigating any pest.
14. A "pest" is defined in Section 2(t) of FIFRA, 7 U.S.C. § 136(t), as any insect, rodent,

nematode, fungus, weed, or any other form of terrestrial or aquatic plant or animal life or virus, bacteria, or other micro-organism (except viruses, bacteria, or other microorganisms on or in living man or other living animals) which the Administrator declares to be a pest under Section 25(c)(1) of FIFRA, 7 U.S.C. § 136w(c)(1).

15. Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg) defines the term “distribute or sell” to include: distribute, sell, offer for sale, hold for distribution, hold for sale, hold for shipment, ship, deliver for shipment, release for shipment, or receive and (having so received deliver or offer to deliver.
16. Respondent “distributes or sells” pesticides as defined by Section 2(gg) of FIFRA, 7 U.S.C. § 136(gg).
17. At the time of the inspection, the imported “Metsulfuron-Methyl 60%” and “Sulfometuron-Methyl 75%” were not registered pesticides with EPA.
18. It is unlawful according to Section 12(a)(1)(A) of FIFRA, 7 U.S.C. § 136j(a)(1)(A), for any person to distribute or sell to any person any pesticide that is not registered under Section 3 of FIFRA, 7 U.S.C. § 136a.
19. Respondent violated Section 12(a)(1)(A) of FIFRA, 7 U.S.C. § 136j(a)(1)(A), on at least two occasions, and is therefore subject to the assessment of civil penalties under Section 14 of FIFRA, 7 U.S.C. § 136l.
20. According to FIFRA 2(q)(1)(E), 7 U.S.C. § 136(q)(1)(E), a pesticide is misbranded if any word, statement, or other information required to appear on the label is not prominently placed thereon.
21. According to FIFRA 2(q)(1)(F), 7 U.S.C. § 136(q)(1)(F), a pesticide is misbranded if its

labeling does not contain directions for use which are necessary for effecting the purposes of FIFRA.

22. It is unlawful according to FIFRA 12(a)(1)(E), 7 U.S.C. § 136j(a)(1)(E), for any person in any State to distribute or sell to any person any pesticide which is misbranded.
23. Respondent violated Section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(E), on at least two occasions and is therefore subject to the assessment of civil penalties under Section 14 of FIFRA, 7 U.S.C. § 136l.
24. According to FIFRA Section 12(a)(2)(M), 7 U.S.C. § 136j(a)(2)(M), it shall be unlawful for any person to knowingly falsify all or part of any report filed under FIFRA.
25. Respondent violated FIFRA Section 12(a)(2)(M), 7 U.S.C. § 136j(a)(2)(M), on at least one occasion and is therefore subject to the assessment of civil penalties under Section 14 of FIFRA, 7 U.S.C. § 136l.
26. It is unlawful according to FIFRA Section 12(a)(2)(N), 7 U.S.C. § 136j(a)(2)(N), for any person who is a registrant, wholesaler, dealer, retailer, or other distributor to fail to file reports required by this Act.
27. Respondent failed to file a separate Notice of Arrival of Pesticides and Devices form pertaining to the November 11, 2004, importation of (60)-25kg. drums of unregistered "Sulfometuron-Methyl 75%".
28. Respondent violated FIFRA Section 12(a)(2)(N), 7 U.S.C. § 136j(a)(2)(N), on at least one occasion and is therefore subject to the assessment of civil penalties under Section 14 of FIFRA, 7 U.S.C. § 136l.
29. Section 14 of FIFRA, 7 U.S.C. § 136l, in conjunction with the Civil Monetary Inflation

Adjustment Rule, 40 CFR Part 19, authorizes EPA to assess a civil penalty of not more than \$6,500 for each offense that occurs on or after March 15, 2004.

30. Section 14(a)(4) of FIFRA, 7 U.S.C. § 136l(a)(4), requires EPA to consider the appropriateness of the assessed penalty to the size of business of the Respondent, the effect on Respondent's ability to continue in business, and the gravity of the violation.
31. The EPA proposes to assess a total civil penalty of TWENTY SIX THOUSAND DOLLARS (\$26,000) against the Respondent for the above violations. Civil penalties under Section 14(a) of FIFRA, 7 U.S.C. § 136l(a), may be assessed by Administrative Order.

III. Consent Agreement

32. For the purposes of this CAFO, Respondent admits the jurisdictional allegations set forth above and neither admits nor denies the factual allegations.
33. Respondent waives its right to a hearing on the allegations contained herein and its right to appeal the proposed final order accompanying the consent agreement.
34. Respondent consents to the assessment of the penalty proposed by EPA and agrees to pay the civil penalty as set forth in this CAFO.
35. Respondent agrees to place the pesticides referenced at Paragraph 12 in a bonded warehouse within two weeks of the effective date of this CAFO and, unless (a) the pesticides are lawfully destroyed or otherwise disposed of, or (b) the pesticides are lawfully returned to the country of origin, to hold the pesticides in a bonded warehouse until product registration is complete.
36. Respondent certifies that it will be in compliance with all relevant requirements of FIFRA or this CAFO with regard to the pesticides at issue within two weeks after the effective date of this CAFO.

37. Compliance with this CAFO shall resolve the allegations of the violations contained herein. This CAFO shall not otherwise affect any liability of Respondent to the United States. Other than as expressed herein, neither EPA nor Complainant waives any right to bring an enforcement action against Respondent for violation of any federal or state statute, regulation or permit, to initiate an action for imminent and substantial endangerment, or to pursue criminal enforcement.
38. Complainant and Respondent agree to settle this matter by their execution of this CAFO. The parties agree that the settlement of this matter is in the public interest and that this CAFO is consistent with the applicable requirements of FIFRA.

IV. Final Order

39. Respondent is assessed a civil penalty of TWENTY SIX THOUSAND DOLLARS (\$26,000) which is to be paid within thirty (30) days of the effective date of this CAFO.
40. Respondent shall pay the penalty by forwarding a cashier's or certified check, payable to the "Treasurer, United States of America," to the following address:

U.S. Environmental Protection Agency
Cincinnati Accounting Operations
Mellon Lockbox 371099M
Pittsburgh, PA 15251-7099.

**The check shall reference on its face the name and the Docket Number of the CAFO
"Woodlands Specialists, Inc., FIFRA-04-2005-3025(b)."**

41. At the time of payment, Respondent shall send a separate copy of the check, and a written statement that the payment is being made in accordance with this CAFO, to the following persons at the following addresses:

Regional Hearing Clerk
U.S. EPA - Region 4
61 Forsyth Street
Atlanta, Georgia 30303;

Mark D. Bloeth (APT-PS)
U.S. EPA - Region 4
61 Forsyth Street
Atlanta, Georgia 30303;

and,
Saundi Wilson
Environmental Accountability Division
U.S. EPA - Region 4
61 Forsyth Street
Atlanta, Georgia 30303.

42. For the purposes of state and federal income taxation, Respondent shall not be entitled, and agrees not to attempt, to claim a deduction for any civil penalty payment made pursuant to this CAFO. Any attempt by Respondent to deduct any such payments shall constitute a violation of this CAFO.
43. Pursuant to 31 U.S.C. § 3717, EPA is entitled to assess interest and penalties on debts owed to the United States and a charge to cover the cost of processing and handling a delinquent claim. Interest will therefore begin to accrue on the civil penalty from the date of entry of this CAFO, if the penalty is not paid by the date required. A charge will also be assessed to cover the administrative costs, both direct and indirect, of overdue debts. In addition, a late payment penalty charge shall be applied on any principle amount not paid within 90 days of the due date.
44. Complainant and Respondent shall bear their own costs and attorney fees in this matter.
45. This CAFO shall be binding upon the Respondent, its successors and assigns.

46. The undersigned representative of the party to this CAFO certifies that he or she is fully authorized by the party represented to enter into this CAFO and legally binds that party to this CAFO.

V. Effective Date

47. The effective date of this CAFO shall be the date on which the CAFO is filed with the Regional Hearing Clerk.

In the Matter of:

Woodlands Specialists, Inc.
Docket No. FIFRA-04-2005-3025(b)

AGREED AND CONSENTED TO:

Woodlands Specialists, Inc.

By: [Signature]

Date: 8-19-2005

Name: Leigh B. Allen (Typed or Printed)

Title: President (Typed or Printed)

U.S. Environmental Protection Agency

By: [Signature]

Date: 8/31/05

Beverly H. Banister, Director
 Air, Pesticides and Toxics
 Management Division
 61 Forsyth Street
 Atlanta, Georgia 30303

APPROVED AND SO ORDERED this 12th day of Sept 2005.

[Signature]

Susan B. Schub
 Regional Judicial Officer

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and correct copy of the foregoing Consent Agreement and Final Order, in the Matter of: Woodlands Specialists, Inc., Docket No. FIFRA-04-2005-3025(b), on the parties listed below in the manner indicated.

Cheryn Jones, APT-PS
Pesticides Section
U.S. EPA - Region 4
61 Forsyth Street
Atlanta, GA 30303-8960
(404) 562-9006

(Via EPA's internal mail)

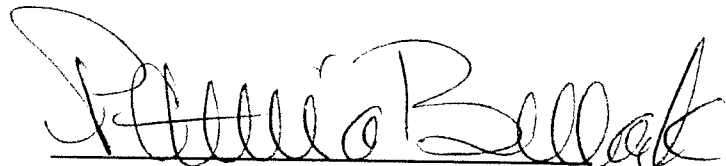
Richard Leahy
Office of Environmental Accountability
U.S. EPA - Region 4
61 Forsyth Street
Atlanta, GA 30303-8960
(404) 562-9573

(Via EPA's internal mail)

Mr. Leigh B. Allen
President
Woodlands Specialists, Inc.
Hangar 209 Craig Field
Selma, AL 36701

(Via Certified Mail - Return Receipt Requested)

Date: 9-12-05



Patricia A. Bullock, Regional Hearing Clerk
United States Environmental
Protection Agency, Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-8960
(404) 562-9511

EPA ACCOUNTS RECEIVABLE CONTROL NUMBER FORM

TO BE COMPLETED BY THE ORIGINATING OFFICE:

(Attach a copy of the final order and transmittal letter to Defendant/Respondent)

This form was originated by: Stacy Walther on 9/6/05
(Name) (Date)

in the DAKOTA - An at (404) 562-9582
(Office) (Telephone Number)

☐ Non-SF Judicial Order/Consent Decree
USAO COLLECTS

☒ Administrative Order/Consent Agreement
FMO COLLECTS PAYMENT

☐ SF Judicial Order/Consent Decree
DOJ COLLECTS

☐ Oversight Billing - Cost Package required:
Sent with bill

☐ Other Receivable

☐ Not sent with bill

☐ This is an original debt

☐ Oversight Billing - Cost Package not required

☐ This is a modification

PAYEE: Woodlands Specialists Inc
(Name of person and/or Company/Municipality making the payment)

The Total Dollar Amount of the Receivable: \$ 26,000
(If installments, attach schedule of amounts and respective due dates. See Other side of this form.)

The Case Docket Number: Super - 04-2005-3025 (6)

The Site Specific Superfund Account Number: _____

The Designated Regional/Headquarters Program Office: _____

TO BE COMPLETED BY LOCAL FINANCIAL MANAGEMENT OFFICE:

The IFMS Accounts Receivable Control Number is: _____ Date: _____

If you have any questions, please call: Peggy Whitney of the Financial Management Section at: (404) 562-8238.

DISTRIBUTION:

A. **JUDICIAL ORDERS:** Copies of this form with an attached copy of the front page of the **FINAL JUDICIAL ORDER** should be mailed to:

- | | |
|--|---|
| 1. Debt Tracking Officer
Environmental Enforcement Section
Department of Justice RM 1647
P.O. Box 7611, Benjamin Franklin Station
Washington, D.C. 20044 | 2. Originating Office (EAD)
3. Designated Program Office |
|--|---|

B. **ADMINISTRATIVE ORDERS:** Copies of this form with an attached copy of the front page of the Administrative Order should be to:

- | | |
|--|---|
| 1. Originating Office
2. Regional Hearing Clerk | 3. Designated Program Office
4. Regional Counsel (EAD) |
|--|---|

EPA ACCOUNTS RECEIVABLE CONTROL NUMBER FORM

PROGRAM SPECIFIC INFORMATION

PROGRAM: CLF 2115-01

Case Docket Control Number: 94ra-04-2005-3025(6)

Total Amount Due: \$26,000

☒ Full payment due 30 days after issuance date of _____

☐ Installment payments to be paid:

Amount Due:

Date Due:

\$ _____

\$ _____

\$ _____

\$ _____

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY****Region 4****61 Forsyth Street, SW
Atlanta, Georgia 30303****FIFRA REFERRAL****REQUEST NUMBER:** 046-AL-07**IMPORTER NAME AND ADDRESS:****DATE STAMP:** 04-10-07Woodlands Specialists, Inc.
Hangar 209 Craig Field
Selma, Alabama 36701**TO:**Tony Cofer
Program Director
Alabama Dept. of Ag & Industries
1445 Federal Drive
Montgomery, AL 36107-0336**PESTICIDE:** Unregistered Metsulfuron
Methyl Herbicide from China**EPA Reg. No.** None**EPA Est. No.** None**BASIS FOR REFERRAL:** Importation of unregistered pesticide.

As you know, Region 4 has been communicating with the FBI office in Birmingham, Alabama about a long standing importation issue involving Woodlands Specialist's June 9, 2004, importation of 1,000 kilograms of unregistered Metsulfuron Methyl which has not been exported and was being stored at Shippers Express in Birmingham, AL. ADAI conducted follow-up inspections previously for Region 4 via Referral (#037-AL-06) in March 2006. It is Region 4's understanding from the FBI that all of the pesticide and fertilizer products being stored by Shippers Express on behalf of Woodlands Specialists have now been transported back to Woodlands Specialists's facility in Selma, Alabama.

Please conduct another follow-up import inspection at Woodlands Specialists to document this transferred inventory of materials and issue a state Stop Sale Order relative to the unregistered Chinese Metsulfuron Methyl.

REQUESTOR'S NAME:Stuart Perry, Acting Chief
PCB & Chemical Products
Management Section**Signature****REGION 4 CONTACT:**

Mark Bloeth (MDB)

PHONE NO: (404) 562-9013**FAX NO:** (404) 562-8973



FAX TO: (334) 240-9168

- ORIGINAL IN MAIL to ADAI



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 4

61 Forsyth Street, SW
Atlanta, Georgia 30303

FIFRA REFERRAL

REQUEST NUMBER: 037-AL-06

DATE STAMP: FEB 24 2006

TO:

Tony Cofer
Program Director
Alabama Dept. of Ag & Industries
1445 Federal Drive
Montgomery, AL 36107-0336

BASIS FOR REFERRAL:

Follow up of unregistered pesticide importation
being held for potential export.

FACILITY NAMES AND ADDRESSES:

Shippers Express (Mr. James Alexander)
2450 Pinson Valley Parkway
Birmingham, Alabama 35217
(205) 849-0093
1-(866) 236-0503

Woodlands Specialists, Inc. (Mr. Leigh B. Allen)
Hangar 209 Craig Field
Selma, Alabama 36701
(334) 872-6001

PESTICIDE: Metsulfuron Methyl 60% WDG

EPA Reg. No. None

EPA Est. No. None

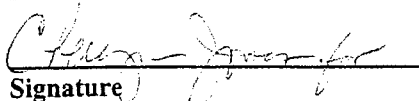
Mr. James Alexander (Shippers Express) phoned EPA Region 4 about lengthy storage issues regarding the above unregistered pesticide. The responsible party of record is Woodlands Specialists, Inc., Hangar 209 Craig Industrial Park, Selma, Alabama 36701. Region 4 took a recent civil penalty action on 09/12/05 [FIFRA-04-2005-3025(b)] of which, part involved this same unregistered active ingredient (Metsulfuron Methyl 60%). It is unknown whether the material being held at Shippers Express is the identical material at issue in the penalty action (attached) or if it is altogether an independent and different inventory intended to be exported by Woodlands Specialists, Inc.

Please conduct an import/export inspection to fully document the specifics of its importation and arrival to Shippers Express. According to Mr. Alexander, the material was repackaged for potential export to Ghana. Mr. Alexander also indicated that he has retained some of the original material as it was received. Please take documentary samples of both of the different packaged products and also obtain a statement / affidavit from Mr. Alexander summarizing his involvement.

In addition, please also conduct a follow-up import inspection at Woodlands Specialists, Inc. regarding this specific pesticide stored at Shippers Express and send the combined case file to EPA Region 4. Any paperwork showing this products original importation and the source of origin would also be very helpful.

REQUESTOR'S NAME:

Keith Bates, Acting Chief
Pesticides Section


Signature

REGION 4 CONTACT:

Mark Bloeth

PHONE NO: (404) 562-9013

FAX NO: (404) 562-8973



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

FEB 1 2007

4APT-PTSB

Federal Express - Overnight Delivery

Mr. Leigh Allen
President
Woodlands Specialists, Inc.
45 Berkeley Circle
Hangar 209 - Craig Field
Selma, Alabama 36701

SUBJ: Opportunity to Show Cause
Violation of Federal Insecticide, Fungicide and
Rodenticide Act (FIFRA)

Dear Mr. Allen:

The United States Environmental Protection Agency (EPA) has reason to believe Woodlands Specialists, Inc. (hereinafter, "Woodlands") has violated provisions of FIFRA, 7 U.S.C. §§ 136 *et seq.*, in the following manner.

On February 23, 2006, EPA Region 4 received information about pesticides and fertilizers being held for intended export by Woodlands Specialists, Inc. On February 24, 2006, EPA Region 4 sent a referral (#037-AL-06) to the Alabama Dept. of Agriculture & Industries (ADAI) to conduct a follow-up import inspection at Woodlands.

In March 2006, ADAI conducted follow-up import inspections at several locations pertaining to Woodlands' importation in June 2004 of 1,000 kg. of unregistered Metsulfuron Methyl from China for intended exportation. ADAI also documented that Woodlands has been fined by US Customs and Border Protection for not either exporting or destroying the unregistered pesticide by June 3, 2005.

On or about June 9, 2004, Woodlands imported (40)-25 kg. fiber drums of unregistered Metsulfuron Methyl 60% under a Temporary Importation Bond (#AM304087035) from China. On or about late August or September 2005, Woodlands re-packaged the 1,000 kg. into 151 cases each containing (4)-1 Gal. white plastic containers of granulated Metsulfuron Methyl 60%. ADAI documented the labeling of this re-packaged pesticide for export.

The importation and distribution of 1,000 kg. of unregistered Metsulfuron -Methyl 60% (without exportation as intended) is a violation under FIFRA Section 12(a)(1)(A) which states "... It shall be unlawful for any person in any State to distribute or sell to any person — any pesticide that is *not registered* under section 3..."

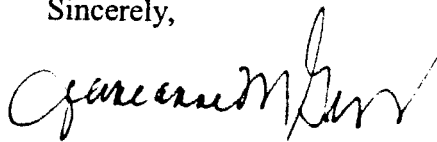
The importation, distribution, and subsequent repackaging of 1,000 kg. of unregistered Metsulfuron -Methyl 60% is a violation under FIFRA Section 12(a)(2)(L), in that Respondent failed to file the required pesticide producing annual production report for calendar year 2005 relative to this production activity.

The importation and distribution of 1,000 kg. of Metsulfuron -Methyl 60% is a violation under FIFRA Section 12(a)(1)(E) "... It shall be unlawful for any person in any State to distribute or sell to any person — any pesticide which is ... *misbranded*." Specifically, the pesticide is not labeled according to Subpart D - Export Policy regarding "Not Registered for Use in the United States" and multilingual labeling requirements.

Pursuant to Section 14(a) of FIFRA, 7 U.S.C. § 136l(a), each violation is subject to a civil penalty of up to \$6,500. This letter serves to notify you of the opportunity to show cause why EPA should not take enforcement action with respect to these violations. This opportunity will be made available at a meeting with EPA in Atlanta on a mutually convenient date. It may be possible to discuss these matters by telephone conference. If you wish to take advantage of this opportunity, please contact Mr. Mark Bloeth at (404) 562-9013 within 10 calendar days of the date of this letter.

Enclosed is a copy of "EPA Small Business Resources." This document will provide you with information regarding compliance and rights you may be entitled to under the Small Business Regulatory Enforcement Fairness Act. For your convenience, we are also enclosing a copy of the EPA Region 4 Small Business Quick Reference Guide. Another document you may wish to review is the EPA Supplemental Environmental Projects Policy dated May 1, 1998, located on the Internet at <http://www.epa.gov/compliance/civil/programs/seps/index.html>. The Policy sets forth types of projects that qualify as supplemental environmental projects, the terms and conditions under which they may become part of a settlement, and the penalty mitigation appropriate for a particular project. A hard copy of the Policy can be obtained from the contact person listed in the above paragraph.

Sincerely,



Jeananne M. Gettle

Chief

Pesticides Management Section

Enclosures

cc: Tony Cofer (ADAI)



Hangar 209 Craig Industrial Park
Phone: (334) 872-6001

Scime, Alabama 36701
Fax: (334) 874-3948

February 23, 2006

Mark Bloeth
US EPA
VIA FACSIMILE: 404-562-8973

↑
(334) 872-6001

Dear Sir:

In compliance with the consent decree between the US EPA and Woodlands Specialists, Inc., the following actions were taken with regards to the subject herbicide:

As per the instructions from C-MAC Environmental, we transferred the herbicide from 120 (25 kg) cardboard drums into 16 (55 gallon) plastic drums and sealed the bung holes. These drums were transferred to C-MAC in August of 2005 with instructions to destroy in accordance with EPA regulations.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Allen'.

Leigh B. Allen, President



C-MAC ENVIRONMENTAL GROUP, INC.

FACILITY EPA ID: ALD981020894

WOODLANDS SPECIALISTS, INC.
HANGER 209 CRAIG FIELD
SELMA, AL 36701-

Site Id: CESQG

CERTIFICATE OF DISPOSAL

C-MAC Environmental Group, Inc, has received Waste Material from WOODLANDS SPECIALISTS, INC. as described on the Generator's Manifest Document 41768 (and State Manifest 241768) on Friday, August 12, 2005.

C-MAC Environmental Group, Inc. hereby certifies that the Waste Material identified above was received and disposed in compliance with State and Federal Regulations.

AUTHORIZED: Mary Anne Brock

DATE: 9/2/05

Emergency Contact Telephone Number

UNIFORM HAZARDOUS
WASTE MANIFEST1. Generator's US EPA ID No.
C E S Q GManifest
Document No.
417682. Page 1
of 1Information in the shaded areas is
not required by Federal law.

3. Generator's Name and Mailing Address

WOODLANDS SPECIALISTS, INC.
HANGER 209 CRAIG FIELD
SELMA, AL 36701-

A. State Manifest Document Number

C-MAC 241768

4. Generator's Phone (334) 872-6001

B. State Generator ID

5. Transporter 1 Company Name

SKELTON TRUCKING LLC.

6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone (334) 872-4878

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

C-MAC ENVIRONMENTAL GROUP, INC.
402 WEBSTER CHAPEL RD
GLENCOE, AL 35905

10. US EPA ID Number

G. State Facility ID

ALD981020894

H. Facility's Phone

(256) 492-8340

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

HM

HERBICIDE. ACRA & DOT NON-HAZARDOUS/NON-REGULATED.

12. Containers

No.

Type

13. Total
Quantity14. Unit
Wt/Vol

15. Waste No.

a.

88220

16

DM

00880

G

N/A

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

AL

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

MR. LEIGH ALLEN/ (334) 872-6001

129976/

CD

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Steve Rogers

Signature

Steve Rogers

Month Day Year

08/12/05

17. Transporter 1 Acknowledgment of Receipt of Materials

Printed/Typed Name

Wendy Thomas

Signature

Wendy Thomas

Month Day Year

08/12/05

18. Transporter 2 Acknowledgment of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name

MX Brock

Signature

MX Brock

Month Day Year

8/2/05

GENERATOR

TRANSPORTER

FACILITY



Hangar 209 Craig Field,
Phone: 334-872-6001

Selma, AL 36701
Fax: 334-874-3948

FAX COVER SHEET

To: Mark Bloeth
Company: U.S. EPA
Fax No: 404-562-8973

From: Leigh Allen Date: 2-23-06
Fax No: 334-874-3948

Pages (including cover sheet) 4

☒ Urgent

☐ For Review

☐ Please Comment

☐ Please Reply

Message:

COMPANY 1 OF 1

PGM: SS2112N1

U. S. ENVIRONMENTAL PROTECTION AGENCY

12/13/06

SS2112M1

SECTION SEVEN TRACKING SYSTEM

09:15:21

COMPANY DETAIL

Company Number: 081198

Status: INACTIVE

DUNS Number: - -

Reason: NO LONGER PRODUCING PRODUCT(S)

Company Name : WOODLANDS SPECIALISTS INC

: ATTN: LEIGH ALLEN, PRESIDENT

Site Address : 209 CRAIG FIELD

City : SELMA

State: AL ZIP Code: 36701 -

County : DALLAS

Mail Address : 209 CRAIG FIELD

City : SELMA

State: AL ZIP Code: 36701 -

State Incorp.: DE

Officer : LEIGH ALLEN

Date Incorp. : 08/31/2003

Title : PRESIDENT

Active Estab : 0

Telephone : 334-872-6001

Inactive Estab: 1

Date Signed: 03/08/2004

Type of Ownership: CORPORATION

Press appropriate PF key

Comments: N

Enter-PF1---PF2---PF3---PF4---PF5---PF6---PF7---PF8---PF9---PF10---PF11---PF12---
HELP GOTO END MAIN UP DOWN CMNTS DATES

ESTABLISHMENT 1 OF 1
PGM: SS2122N1 U. S. ENVIRONMENTAL PROTECTION AGENCY 12/13/06
M SS2122M1 SECTION SEVEN TRACKING SYSTEM 09:12:40
ESTABLISHMENT DETAIL

=====

Estab. Number: 081198-AL -001	Status: INACTIVE	DUNS Number: - -
Reason: NO LONGER PRODUCING PRODUCT(S)		

Estab. Name : WOODLANDS SPECIALISTS INC

Site Address : 209 CRAIG FIELD	
City : SELMA	State: AL ZIP Code: 36701 -
County : DALLAS	
Mail Address : 209 CRAIG FIELD	
City : SELMA	State: AL ZIP Code: 36701 -

SIC Description
No SIC codes for this establishment
Officer : LEIGH ALLEN
Title : PRESIDENT
Telephone : 334-872-6001
Date Signed: 03/08/2004

Press appropriate PF key Comments: N

=====

Enter-PF1---	PF2---	PF3---	PF4---	PF5---	PF6---	PF7---	PF8---	PF9---	PF10--	PF11--	PF12---
HELP	GOTO	END	MAIN		UP	DOWN	RPTS	CMNTS	DATES	CMPNY	

PGM: SS2 123N1
SS2 123M1U. S. ENVIRONMENTAL PROTECTION AGENCY
SECTION SEVEN TRACKING SYSTEM
PRODUCTION REPORTS LIST12/13/06
09:12:57

=====

Establishment : 081198-AL -001

WOODLANDS SPECIALISTS INC

Mark	Year	Report Status	Date Signed	Received	Reviewed
----	----	-----	-----	-----	-----
-	2003	3540-16 NOT ON DATABASE			
-	2004	ZERO PRODUCTION REPORTED	12/30/04	01/03/05	01/03/05
-					
-					
-					

Press appropriate PF key

=====

Enter-PF1---PF2---PF3---PF4---PF5---PF6---PF7---PF8---PF9---PF10--PF11--PF12---

DTAIL HELP GOTO END MAIN

'ESTABLISHMENT 1 OF 1

PGM: SS2122N1 U. S. ENV

MAP: SS2122M1 SECTI SS2122M2 Establishment Detail - Dates

E

=====

Estab. Number: 081198-AL -001

Estab. Name : WOODLANDS SPECI

Site Address : 209 CRAIG FIELD

City : SELMA

County : DALLAS

Mail Address : 209 CRAIG FIELD

City : SELMA

Received Date: 03/09/2004

Reviewed Date: 03/11/2004

Notified Date: 04/23/2004

Status Date : 10/07/2005

Create User : WJG

Create Date : 04/19/2004

Update User : WJG

Update Date : 10/07/2005

SIC Description

No SIC codes for this e

Press <Enter> to continue

Telephone : 334-872-6001

Date Signed: 03/08/2004

Press appropriate PF key

Comments: N

=====

Enter-PF1---PF2---PF3---PF4---PF5---PF6---PF7---PF8---PF9---PF10---PF11---PF12---

HELP GOTO END MAIN

UP DOWN RPTS CMNTS DATES CMPNY



United States Environmental Protection Agency
Washington, DC 20460

**Notice of Arrival of
Pesticides and Devices**

Send Completed Form to
Appropriate Regional Office
Listed on the Reverse of this
Form.

Form Approved
OMB No. 2070-0020

Note: Read Instructions on reverse before completing form.

Part I: To Be Completed by Importer or Agent

1. Name and Complete Address of Broker or Agent CAROLE C LELAND, CHB 244 WEST VALLEY AVE SUITE 205 BIRMINGHAM, AL 35209		2. Name and Complete Address of Importer or Consignee LEIGH B ALLEN 45 BERKELEY CIRCLE, HANGER 209 CRAIG FIELD SELMA, AL 36701	
<input checked="" type="checkbox"/> Return Form to this Address		<input type="checkbox"/> Return Form to this Address	
3. Name and Address of Shipper JIANGSU CHANGLONG CHEMICALS CO, LTD LONGHU TANG, NEW DISTRICT OF CHANGZHOU, JIANGSU P.R. CHINA		4. EPA Registration Number	5. EPA Producer Establishment No. 74134-CHN-001
		6. Brand name of Product	
7. Major Active Ingredients and Percentage of Each METSULFURON METHYL 60%			
8. Unit Size kgs	9. Quantity 40	10. Total Net Weight 1,115 kgs	11. Country of Origin CHINA
12. Port of Entry BIRMINGHAM, AL		13. Carrier AIR CHINA	
14. Entry Number AM3-0408703-5		15. Entry Date 6/9/04	
16. Location of Goods for Examination after Importation B'HAM EXPRESS		17. I assert that information constituting Confidential Business Information is shown in the above blocks numbered: (Note: Blocks 4, 5, 6, 7 are not entitled to CBI treatment—see Instructions)	
18. Remarks Entered under TIB # AM3-0408703-5 for packaging & export.			

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

19. Printed Name of Importer or Agent Melissa Snodgrass	Telephone Number 205) 328-2343	20. Signature of Importer or Agent Melissa Snodgrass	Date Signed 6/11/04
--	-----------------------------------	---	------------------------

Part II: To Be Completed by U.S. Environmental Protection Agency

Action to be taken by U.S. Customs Service		Release shipment to consignee under bond. Shipment must be held intact pending inspection.	
<input type="checkbox"/> Release Shipment	<input type="checkbox"/> Detain for Inspection	<input type="checkbox"/>	
<input checked="" type="checkbox"/> Other (Specify)			
Remarks RELEASE UNDER T.I.B. FOR PROCESSING AND EXPORT ONLY.			

Signature and Title of EPA Official R. O. Jurek, PBS	Date 6/24/04
---	-----------------

Part III: To Be Completed by U.S. Customs Service

The information shown in Part I was compared with the entry papers for this shipment and no discrepancies were noted. The shipment was handled as instructed by EPA in Part II. Any deviations should be brought to the attention of EPA before releasing shipment and should also be noted in "Remarks."

Remarks	
Signature of District Director of Customs	Date

NOTICE OF PENALTY OR LIQUIDATED DAMAGES INCURRED
AND DEMAND FOR PAYMENT

19 USC 1618, 19 USC 1823

Port Name and Code

1904 BIRMINGHAM, AL

Investigation File No.

TO: LEIGH B. ALLEN
45 BERKELEY CIRCLE, HANGAR 209
SELMA AL 36701

TEAM NUMBER: 502

ID: 427198293

PAGE 1 OF 1

DEMAND IS HEREBY MADE FOR PAYMENT OF \$ 100.00, representing ☐ Penalties or ☒ Liquidated Damages
assessed against you for violation or law or regulation, or breach of bond, as set forth below:

TIB NUMBER: AM304087035

TIB ENTERED: 06/25/2004 IMPORTED: 06/03/2004

EXPORT/DESTRUCTION REQUIRED BY: 06/03/2005

MERCHANDISE DESCRIPTION:

METSULFURON METHYL 60 PERCENT WDG, 1000 KGS PACKED IN 40 DRU
LIQUIDATED DAMAGES HAVE BEEN COMPUTED AT TWICE THE DUTY DUE
FAILURE TO EXPORT OR DESTROY MERCHANDISE IN ACCORDANCE WITH THE TERMS
AND CONDITIONS OF THE TEMPORARY IMPORTATION BOND.*Received 4 pallets International Shipper 8/10/05*

LAW OR REGULATION VIOLATED

19CFR10.39(D)(1)

BOND BREACHED

BOND TYPE: SINGLE TRANSACTION
BOND # 08703DESCRIPTION OF BOND
(if any)

Form Number

Amount

\$

27,685

Date

06/22/2004

Name and Address of Principal on Bond

LEIGH B. ALLEN

45 BERKELEY CIRCLE, HANGAR 209, SELMA, AL 36701

Name and Address of Surety on Bond

INTERNATIONAL FIDELITY INS CO

C/O INT'L BOND & MARINE BKGE, TWO HUDSON PLACE, 4TH FLOOR, HOBOKEN, NJ 421

Surety Identification No.

If you feel there are extenuating circumstances, you have the right to object to the above action. Your petition should explain why you
should not be penalized for the cited violation. Write the petition as a letter or in legal form; submit in (duplicate) (triplicate),
addressed to the Commissioner of Customs, and forward to the FP&F Officer at

U.S. CUSTOMS/FP&F, P.O. BOX 2748, MOBILE, AL 36652 (251) 441-5102

Unless the amount herein demanded is paid or a petition for relief is filed with the FP&F
Officer within the indicated time limit, further action will be taken in connection with your
bond or the matter will be referred to the United States Attorney.TIME LIMIT FOR PAYMENT OR
FILING PETITION FOR RELIEF
(Days from the date of this Notice)

60

Signature

ELOISE DUFF

Title

FPF OFFICER

Date

07/20/2005

By

Customs Form 5955A (08/00)



HOME OFFICE: 1651 KERR DR., P.O. BOX 8308
JACKSON, MISSISSIPPI 39284

JAMES ALEXANDER
TERMINAL MANAGER/SALES

PHONE 205-849-0093
FAX 205-849-8633

2/23/06

✓ To Mr Mark Bloethe 404 562 8973
EPA Regional Office
Atlanta, Georgia

cc Mr David Pond USCS - Bham, AL

Ref Ligh B Allen vs Proposal of
Metsulfuron Methyl 40% WDG.

Mr Bloethe:

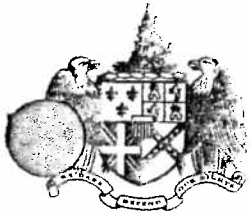
Attached is a copy for a fine levied
by USCS last July 20 regarding the
aforementioned shipment.

My signature & date of 8/4 indicates
my receipt of 4 pallets of the above
described shipment. The shipment was
to be exported to Ghana. To date, the
export broker, has been unable to
get booking, or hasn't been able to get
the proper documentation to have this
shipment exported.

It was set to be destroyed / exported
6/3/05. It is on my dock and has
been since 8/10/05. 9 weeks after the
deadline given to Mr Allen by Elcose
Ruff USCS FFP officer from Mobile.

(over)

We received approximately 100 corrupted
files that "supposedly" made these golden eggs
of the Metasploit must standards for export.
We repackage containers we observed Mr. Ford
on each make and he said they looked ok. we
by USAS (them and he said they looked ok. we
did search off the ~~the~~ words "product of U.S.A.
which were fraudulent to begin with.
I know of no certification to destroy this
material that Mr. Allen claims to have. If
in fact, he is in possession of such and the
material was destroyed, my only question is:
Did the shipment I took result from a multiple
shipment?; cloning, or more.
On cloning, this is the situation as stated
of additional information to need you might
Port Director David Ford (P) 205 9311464 Fax 205 7310976
the owner I am sure of this material off
my desk, the latter I'll like it
Thanking you for your interest/help,
am -
Jimmie Deland
Bismarck, North Dakota



STATE OF ALABAMA

DEPARTMENT OF AGRICULTURE AND INDUSTRIES

1445 Federal Drive

Montgomery, Alabama 36107-1123



Ron Sparks
Commissioner

Food Safety & Consumer Division
Pesticide Management Section

Phone: (334) 240-7240 Fax: (334) 240-7168

Mailing Address:
Post Office Box 3336
Montgomery, AL 36109-0336



April 3, 2006

MEMORANDUM

TO: Dr. Patrick Morgan, Program Director, Pesticide Management & Jerry Haynes, ACPS

FROM: Vernon Wiggins, ACPS Inspector *vw*

RE: Case # 06022, Woodland Specialist, Incorporated

On Monday, March 20, 2006, I received a phone call from Agent Molly Frazier with the Bureau of Customs and Border Protection, Mobile District. The phone call regarded a request Inspector Jerry Haynes, Dalton Brown and myself made during an inspection on Thursday, March 16, 2006. We requested any information the Bureau of Customs and Border Protection, Mobile District could provide concerning pesticide products allegedly imported from China, or other ports of origination, to Woodland Specialist, Incorporated. Agent Frazier was unable to locate any information regarding the shipment(s) in question with the information provided to her. She offered further assistance if needed.

"We provide employment & services without discrimination"

STATE OF ALABAMA

DEPARTMENT OF AGRICULTURE AND INDUSTRIES

1445 Federal Drive
Montgomery, Alabama 36107-1123



Ron Sparks
Commissioner

Pesticide Management Section
Room 212
Ph: 334/240-7242 Fax: 334/240-7168

Mailing Address:
Post Office Box 3336
Montgomery, AL 36109-0336

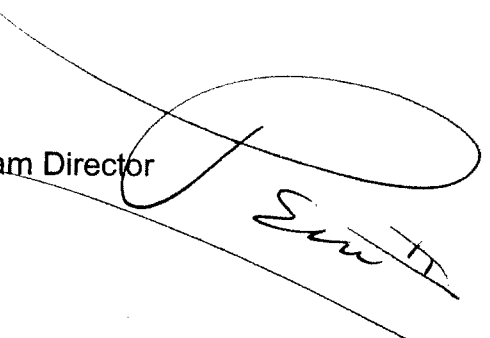
May 9, 2006

MEMORANDUM

To: Andy Wilson

From: Dr. Patrick E. Morgan II, Program Director
Pesticide Management Section

Re: EPA Referral 037-AL-06



Enclosed is the original report for a PEI inspection conducted at Woodland Specialist, Inc. for Region's review.

pc: File #06022

PEM/sb

PESTICIDE PRODUCER ESTABLISHMENT INSPECTION REPORT

SE# 06022 DOI 03/07/06 INSP# 0101 SEQ# 01 GRANT (Y) / N DEPT (P) / S / O
 SECTION TYPE PEI REASON FOR INSPECTION FC FACILITY FUNCTION NA USE SITE NA
 ACTIVITY INVOLVED: FED FACILITY N GRD WATER N WPS N ENDANGERED SPECIES N CANCELED/SUSPENDED N
 Firm Name: SHIPPERS EXPRESS Credentials (Y) / N
 Address: 2450 PINSON VALLEY PARKWAY (2244 Pinson...) Notice of Inspection (Y) / N
 City/State/zip: BIRMINGHAM, ALABAMA 35217 Receipt for Samples (Y) / N
 Phone: (205) 849-0093 COUNTY JEFFERSON Samples 2 Exhibits 5

EPA ESTABLISHMENT NUMBER: NONE

Time: In 10:00 AM Out 12:30 PM

1. Samples: (Sample Codes: CON - Product Container; DOC - Documentary; PES - Commercial Pesticide; OTH - Other)

Sample Id Number	Code	EPA Reg Number	Brand Name	Active Ingredient
03070601010101	DOC	NONE	METSULFURON METHYL 60% WDG	METSULFURON METHYL
03070601010102	DOC	NONE	METSULFURON METHYL 60% WDG	METSULFURON METHYL

2. Establishment Official(s) Interviewed/Title/Responsibilities/Phone Numbers:

(1.) JAMES ALEXANDER, TERMINAL MANAGER, RESPONSIBLE FOR TERMINAL OPERATIONS

(2.) _____

(3.) _____

3. Establishment Organizational Information:

(1.) Corporate/Company Officers Names, Titles, Responsibilities & Phone Numbers:

(A.) not determined

(B.) not determined

(C.) not determined

(2.) Related Firms (Names & Addresses): HOME OFFICE: SHIPPERS EXPRESS, 1651 KERR DRIVE (P.O. BOX 8308, JACKSON, MISSISSIPPI 39284

(3.) What is the primary function of the Establishment? (A.) Registrant ☐ (B.) Primary Production Facility ☐
 (C.) Repackage (small quantity) ☐ (D.) Bulk Repackage ☐ (E.) Other: Import/Export Distributor

4. Guarantees and Labeling Agreements (NOTE: If yes, list firm name/address/product/EPA Reg. No.)

(1.) Does the Establishment manufacture/label/package pesticide products for other registrants? Y / N / (NA)

(2.) Does the Establishment have pesticide products manufactured/labeled/packaged by another firm? Y / N / (NA)

(3.) Does the Establishment have Supplemental Labeling agreement(s) with other firms?

Y / N / ☒ NA

(4.) Does the Establishment have repackaging agreement(s) with other firms?

Y / N / ☒ NA

Repackaging assistance was provided to Woodland Specialists employees consisting of taking 1 gallon jugs from unsuitable case boxes, and replacing in new suitable boxes in preparation for export.

5. Import, Export & Experimental Use Permit (EUP) Activities:

(1.) Does the Establishment currently import any pesticides products?

☒ Y / N / ☒ NA

(2.) Does the Establishment currently export pesticides products?

☒ Y / N / ☒ NA

(3.) Does the Establishment currently produce one or more EUP pesticide products?

Y / N / ☒ NA

(4.) If yes on any of the above, do products comply with the appropriate FIFRA Requirements?

Y / N / ☒ NA

If no, explain & Notes: UNREGISTERED PESTICIDE PRODUCT WAS IMPORTED BY LEIGH ALLEN, d.b.a., WOODLAND SPECIALISTS, UNDER T.I.B.

FROM THE PEOPLES REPUBLIC OF CHINA FOR EXPORT TO BRAZIL, BUT WAS NOT EXPORTED. NOW THE UNREGISTERED PESTICIDE PRODUCT IS TO

BE EXPORTED TO GHANA. PRODUCT HAS REMAINED IN UNITED STATES FOR OVER ONE YEAR, AND HAS BEEN ASSESSED FINES BY U.S. CUSTOMS.

6. Books and Records:

(1.) Does the Establishment comply with FIFRA provisions by maintaining pesticide production, sales, shipping and receiving records as detailed under FIFRA Section 7, Section 6 (a) (2) and 40 CFR Part 169?

Y / N / ☒ NA

If no, explain:

(2.) Was the Part 169 Requirements Summary Sheet provided to and discussed with management?

Y / N / ☒ NA

(3.) Does the Disposal File comply with all of the requirements of 40 CFR Part 169?

Y / N / ☒ NA

If no, explain & Notes:

7. Customer Complaint File:

(1.) Does the Establishment maintain a file of Customer Complaints received regarding its products?

Y / N / ☒ NA

8. Bulk Pesticides:

(1.) Does the Establishment package/repackage pesticides in bulk (containers greater than 55 gallons)?

Y / N / ☒ NA

(2.) Does the Establishment have written contracts with the registrant of each bulk repackaged product?

Y / N / ☒ NA

Notes:

9. Child Resistant Packaging (CRP) Requirements:

(1.) Are all products subject to 40 CFR Part 157 - Subpart packaged in CRP?

Y / N / ☒ NA

(2.) Does Establishment maintain CRP manufacturer's documentation on file for utilized CRP?

Y / N / ☒ NA

10. Product Manufacturing Codes:

(.) Does the Establishment utilize manufacturing codes (batch or lot numbers) on its products?
If yes, give an example of the code & explain: _____

Y / N / **(NA)**

11. Reviews of Pesticide Products Packaged, Labeled and Released for Shipment:

(1.) Number of products currently produced by this location?

0

(2.) Number of products reviewed during this inspection?

1

(3.) Does the Establishment produce products which require 40 CFR Part-156 (Subpart K) labeling?
(a.) If YES, does the product label contain the following 40 CFR Part-156 (Subpart K) statements?

Y / N / **(NA)**

(1) 40 CFR Part 170 Reference?

Y / N

(5) REI Statement?

Y / N

(2) Application Restrictions?

Y / N

(6) Product Type Identification?

Y / N / NA

(3) Spanish Warning?

Y / N / NA

(7) PPE Statement?

Y / N

(4) State Restrictions Statement?

Y / N

(8) Notification To Workers?

Y / N

(4.) Do reviewed product labels appear to comply with provisions of FIFRA & 40 CFR Part-156?

Y / **(N)** / NA

(If no, list products and discrepancies): UNREGISTERED PRODUCT HAS NO LABELING ON THE IMMEDIATE

PRODUCT CONTAINER, AND THE CASE (4 - 1 GAL CONTAINERS/CASE) LABELING LISTS THE COMMON CHEMICAL

NAME OF THE PRODUCT, A "MARINE POLLUTANT" LABEL AND THE NET CONTENTS STATEMENT (4- 1 GALS). THE

COUNTRY ALLEGED TO BE RECEIVING PRODUCT APPARENTLY HAS NOT SPECIFIED LABELING FOR PRODUCT.

Consignees of products which are not available for sampling and inspection:

(1.) Does Establishment have inventory of all pesticides produced over the preceding one year period? Y / N / **(NA)**
If no, list the product & name and address of recent consignees: _____

13. Corrective Action(s), Discussions with Management and Notes: LEIGH ALLEN, WOODLAND SPECIALIST,

IMPORTED THE PRODUCT THROUGH THE BIRMINGHAM AIRPORT ON JUNE 9, 2004 UNDER A "TEMPORARY

IMPORTATION BOND." THE PRODUCT WAS SUPPOSED TO BE PROCESSED AT THE PRODUCER'S FACILITY AND

EXPORTED TO BRAZIL, BUT THIS DID NOT HAPPEN. THE PRODUCT WAS THEN DELIVERED TO SHIPPER'S EXPRESS

FOR EXPORT TO GHANA. U.S. CUSTOM SERVICE HAS ISSUED AT LEAST ONE FINE AGAINST THE PRODUCT WHICH

STIPULATED THAT THE PRODUCT MUST EITHER BE EXPORTED OR DESTROYED BY JUNE 3, 2005. DELAYS APPEAR

TO CONTINUE, AND SHIPPER'S EXPRESS IS CONCERNED THAT MR. ALLEN HAS LOST INTEREST IN THE PRODUCT.

SHIPPER'S EXPRESS IS CONCERNED THAT THEY MAY BECOME RESPONSIBLE FOR DISPOSAL OF THE PRODUCT.

THE PRODUCT WAS RE-BOXED AT THIS LOCATION DURING 2005 WHICH COULD BE INTERPRETED AS PRODUCTION

(AS DEFINED UNDER FIFRA).

JERRY HAYNES

ACPS

Inspector's Name & Title

Signature

0101

Inspector Number

PESTICIDE PRODUCER ESTABLISHMENT INSPECTION REPORT

CASE# 06022 DOI 03/09/06 INSP# 0101 SEQ# 01 GRANT (Y) / N DEPT (P) / S / O
 INSPECTION TYPE PEI REASON FOR INSPECTION FC FACILITY FUNCTION NA USE SITE NA

ACTIVITY INVOLVED: FED FACILITY N GRD WATER N WPS N ENDANGERED SPECIES N CANCELED/SUSPENDED N

Firm Name: WOODLAND SPECIALISTS, INC. (LEIGH B. ALLEN) Credentials (Y) / N

Address: HANGAR 209 - CRAIG FIELD Notice of Inspection (Y) / N

City/State/zip: SELMA, ALABAMA 36701 Receipt for Samples Y / (N)

Phone: (334) 872-6001 COUNTY DALLAS Samples 0 Exhibits 5

EPA ESTABLISHMENT NUMBER: 81198-AL-001 Time: In 10:30 AM Out 12:45 PM

1. Samples: (Sample Codes: CON - Product Container; DOC - Documentary; PES - Commercial Pesticide; OTH - Other)

Sample Id Number	Code	EPA Reg Number	Brand Name	Active Ingredient

2. Establishment Official(s) Interviewed/Title/Responsibilities/Phone Numbers:

(1.) LEIGH B. ALLEN - PRESIDENT, TOTALLY RESPONSIBLE FOR OPERATIONS - 334-872-6001

(2.) WENDY SMITH - BOOKKEEPER, SAFETY TRAINING,

(3.)

3. Establishment Organizational Information:

(1.) Corporate/Company Officers Names, Titles, Responsibilities & Phone Numbers:

(A.) LEIGH B. ALLEN - PRESIDENT, TOTALLY RESPONSIBLE FOR OPERATIONS - 334-872-6001

(B.) STEVE ROGERS, OPERATIONS MANAGER,

(C.)

(2.) Related Firms (Names & Addresses): NONE

(3.) What is the primary function of the Establishment? (A.) Registrant ☐ (B.) Primary Production Facility ☐
 (C.) Repackage (small quantity) ☒ (D.) Bulk Repackage ☐ (E.) Other: IMPORT/EXPORT

4. Guarantees and Labeling Agreements (NOTE: If yes, list firm name/address/product/EPA Reg. No.)

(1.) Does the Establishment manufacture/label/package pesticide products for other registrants? Y / (N) NA

(2.) Does the Establishment have pesticide products manufactured/labeled/packaged by another firm? Y / (N) NA

(3.) Does the Establishment have Supplemental Labeling agreement(s) with other firms?

Y / ☒ NA

(4.) Does the Establishment have repackaging agreement(s) with other firms?

Y / ☒ NA

RECEIVED
PESTICIDE
MANAGEMENT
AGRI. & INC.

5. Import, Export & Experimental Use Permit (EUP) Activities:

(1.) Does the Establishment currently import any pesticides products?

☒ Y / ☒ NA

(2.) Does the Establishment currently export pesticides products?

☒ Y / ☒ NA

(3.) Does the Establishment currently produce one or more EUP pesticide products?

Y / ☒ NA

(4.) If yes on any of the above, do products comply with the appropriate FIFRA Requirements?

Y / ☒ NA

If no, explain & Notes: CHINA IMPORT PRODUCT IS UNREGISTERED AND WAS IMPORTED UNDER T.I.B. FOR PROCESSING AND EXPORT ONLY. PRODUCT HAS NO FIFRA REQUIRED LABELING, BUT UNLABELED CONTAINERS MAY BE ACCEPTABLE TO COUNTRY RECEIVING PRODUCT.

6. Books and Records:

(1.) Does the Establishment comply with FIFRA provisions by maintaining pesticide production, sales, shipping and receiving records as detailed under FIFRA Section 7, Section 6 (a) (2) and 40 CFR Part 169?

Y / ☒ NA

If no, explain: FILE PROVIDED BY LEIGH ALLEN DID NOT CONTAIN PRODUCTION RECORDS. SECTION 7

RECORDS FOR 2005 WERE NOT AVAILABLE FOR INSPECTION ON THE DATE OF THIS INSPECTION.

(2.) Was the Part 169 Requirements Summary Sheet provided to and discussed with management?

Y / ☒ NA

(3.) Does the Disposal File comply with all of the requirements of 40 CFR Part 169?

☒ Y / ☒ NA

If no, explain & Notes:

7. Customer Complaint File:

(1.) Does the Establishment maintain a file of Customer Complaints received regarding its products?

Y / ☒ NA

8. Bulk Pesticides:

(1.) Does the Establishment package/repackage pesticides in bulk (containers greater than 55 gallons)?

Y / ☒ NA

(2.) Does the Establishment have written contracts with the registrant of each bulk repackaged product?

Y / ☒ NA

Notes:

Child Resistant Packaging (CRP) Requirements:

(1.) Are all products subject to 40 CFR Part 157 - Subpart packaged in CRP?

Y / ☒ NA

(2.) Does Establishment maintain CRP manufacturer's documentation on file for utilized CRP?

Y / ☒ NA

10. Product Manufacturing Codes:

(.) Does the Establishment utilize manufacturing codes (batch or lot numbers) on its products? Y / ☒ N / NA

If yes, give an example of the code & explain: _____

11. Reviews of Pesticide Products Packaged, Labeled and Released for Shipment:

(1.) Number of products currently produced by this location? _____

1

(2.) Number of products reviewed during this inspection? _____

1

(3.) Does the Establishment produce products which require 40 CFR Part-156 (Subpart K) labeling? Y / N / ☒ NA

(a.) If YES, does the product label contain the following 40 CFR Part-156 (Subpart K) statements?

(1) 40 CFR Part 170 Reference? _____

Y / N

(5) REI Statement? _____

Y / N

(2) Application Restrictions? _____

Y / N

(6) Product Type Identification? _____

Y / N / NA

(3) Spanish Warning? _____

Y / N / NA

(7) PPE Statement? _____

Y / N

(4) State Restrictions Statement? _____

Y / N

(8) Notification To Workers? _____

Y / N

(4.) Do reviewed product labels appear to comply with provisions of FIFRA & 40 CFR Part-156? Y / ☒ N / NA

(If no, list products and discrepancies): UNREGISTERED CHINESE PRODUCT WAS IMPORTED UNDER T.I.B.

FOR PROCESSING AND EXPORT ONLY. THE CONTAINERS ARE NOT LABELED, BUT IT APPEARS THAT THE COUNTRY RECEIVING THE PRODUCT WILL ACCEPT THE PRODUCT AS PACKAGED.

Consignees of products which are not available for sampling and inspection:

(1.) Does Establishment have inventory of all pesticides produced over the preceding one year period? Y / ☒ N / NA

If no, list the product & name and address of recent consignees: 151 CASES (4 - 1 GALS/CASE) OF

IMPORTED "METSULFURON METHYL 60.0%" ARE CURRENTLY STORED AT SHIPPER'S EXPRESS, 2450

PINSON VALLEY PARKWAY, BIRMINGHAM, ALABAMA 35217 WHERE THEY AWAIT EXPORT TO TEMA,

GHANA.

13. Corrective Action(s), Discussions with Management and Notes:

JERRY HAYNES

ACPS

Inspector's Name & Title

Signature

0101

Inspector Number

IMPORT/EXPORT AGENT INSPECTION REPORT

06022 DOI 03/10/06 INSP# 0101 SEQ# 02 GRANT (Y) N DEPT (P) S O
 INSPECTION TYPE IMP REASON FOR INSPECTION FCA FACILITY FUNCTION NA USE SITE NA
 ACTIVITY INVOLVED. FED FACILITY N GRD WATER N WPS N ENDANGERED SPECIES N CANCELED/SUSPENDED N
 Interviewee: U.S. CUSTOM AND BORDER PROTECTION Credentials (Y) N
 Address: 950 22nd STREET, SUITE 550 (P.O. BOX 320127) Notice of Inspection Y (N)
 City/State/zip: BIRMINGHAM, ALABAMA 35203 (35212) Receipt for Samples Y (N)
 Phone: (205) 731 - 1464 COUNTY JEFFERSON Samples 0 Exhibits 0
 Complainant's Name: EPA REFFERAL #037-AL-06 Responsible Party: DAVID POND
 Applicator Name: _____ Certification Number. _____ Exp. date: _____

1. Samples: (Sample Codes: CON - Product Container; DOC - Documentary; PES - Commercial Pesticide; PUD - Pesticide Use Dilution)

Sample Id Number	Code	EPA Reg Number	Brand Name	Active Ingredient

INTERVIEWEE IS A: Customhouse Broker: () Shipper: () Other: PORT DIRECTOR

1. EXHIBITS: What Was Obtained From the Interviewee? Statement () Confidential Records ()
 Customs Documents () Information (X) Other _____

2. If a Statement Was Not Collected, Describe the Document(s), Record(s), and/or Information Obtained:

ACCORDING TO U.S. CUSTOMS RECORDS, LEIGH ALLEN d.b.a. WOODLAND SPECIALISTS HAS IMPORTED ONE SHIPMENT OF METSULFURON METHYL 60% WDG FROM THE PEOPLES REPUBLIC OF CHINA VIA AIR CHINA ON JUNE 9, 2004 UNDER TEMPORARY IMPORT BOND #AM3.04080703-5 FOR REPACKAGING AND EXPORT ONLY. THE INITIAL T.I.B. HAS EXPIRED (LENGTH OF T.I.B. - 1 YEAR). ALTHOUGH THE T.I.B. COULD BE EXTENDED TWICE (ALLOWING THE PRODUCT TO REMAIN IN THE UNITED STATES FOR A TOTAL OF 3 YEARS), THE IMPORTER HAS NOT FILED FOR THE NECESSARY EXTENSION. CUSTOMS HAS FINED THE COMPANY TWICE FOR VIOLATIONS OF THE INITIAL T.I.B., BUT IS RELUCTANT TO SEIZE THE SHIPMENT BECAUSE OF RESULTING DISPOSAL COSTS.

Y HAYNES - ACPS
 Investigator's Name & Title

Signature

0101

Investigator's Number

IMPORT/EXPORT AGENT INSPECTION REPORT

06022 DOI 03/14/06 INSP# 0101 SEQ# 01 GRANT (Y) N DEPT (P) S O
 INSPECTION TYPE IMP REASON FOR INSPECTION FCA FACILITY FUNCTION NA USE SITE NA
 ACTIVITY INVOLVED: FED FACILITY N GRD WATER N WPS N ENDANGERED SPECIES N CANCELED/SUSPENDED N
 Interviewee: CAROLE C. LELAND, CUSTOMHOUSE BROKER Credentials (Y) N
 Address: 244 WEST VALLEY AVENUE, SUITE 205 (P.O. BOX 11146) Notice of Inspection (Y) N
 City/State/zip: BIRMINGHAM, ALABAMA 35202 (BIRMINGHAM, ALABAMA 35202) Receipt for Samples Y (N)
 Phone: (205) 328 - 2343 COUNTY JEFFERSON Samples 0 Exhibits 0
 Complainant's Name: EPA REFFERAL #037-AL-06 Responsible Party: CAROLE C. LELAND

Applicator Name: _____ Certification Number: _____ Exp. date: _____

1. Samples: (Sample Codes: CON - Product Container, DOC - Documentary, PES - Commercial Pesticide, PUD - Pesticide Use Dilution)

Sample Id Number	Code	EPA Reg Number	Brand Name	Active Ingredient

INTERVIEWEE IS A: Customhouse Broker: (X) Shipper: () Other: _____

1. EXHIBITS: What Was Obtained From the Interviewee? Statement () Confidential Records ()
 Customs Documents () Information (X) Other _____

2. If a Statement Was Not Collected, Describe the Document(s), Record(s), and/or Information Obtained:

REFERRED ALL QUESTIONS TO JENSEN SHIPPING COMPANY, INC. (KAJ JENSEN).

RY HAYNES - ACPS
 Investigator's Name & Title

Signature

0101

Investigator's Number

IMPORT/EXPORT AGENT INSPECTION REPORT

06022 DOI 03/14/06 INSP# 0101 SEQ# 02 GRANT (Y) N DEPT (P) S O
 INSPECTION TYPE IMP REASON FOR INSPECTION FCA FACILITY FUNCTION NA USE SITE NA
 ACTIVITY INVOLVED. FED FACILITY N GRD WATER N WPS N ENDANGERED SPECIES N CANCELED/SUSPENDED N
 Interviewee: JENSEN SHIPPING COMPANY, INC. Credentials (Y) N
 Address: 244 WEST VALLEY AVENUE, SUITE 205 (P.O. BOX 11146) Notice of Inspection (Y) N
 City/State/zip: BIRMINGHAM, ALABAMA 35202 (BIRMINGHAM, ALABAMA 35202) Receipt for Samples Y (N)
 Phone: (205) 324 4253 COUNTY JEFFERSON Samples 0 Exhibits 0
 Complainant's Name: EPA REFFERAL #037-AL-06 Responsible Party: KAJ V. JENSEN
 Applicator Name: _____ Certification Number: _____ Exp. date: _____

1. Samples: (Sample Codes: CON - Product Container. DOC - Documentary; PES - Commercial Pesticide: PUD - Pesticide Use Dilution)

Sample Id Number	Code	EPA Reg Number	Brand Name	Active Ingredient

INTERVIEWEE IS A: Customhouse Broker: () Shipper: (X) Other: IMPORT/EXPORT SHIPPER

1. EXHIBITS: What Was Obtained From the Interviewee? Statement (X) Confidential Records (X)
 Customs Documents (X) Information (X) Other _____

2. If a Statement Was Not Collected, Describe the Document(s), Record(s), and/or Information Obtained:

JENSEN SHIPPING AND CUSTOMHOUSE BROKER, CAROLE C. LELAND, ARE LOCATED IN THE SAME OFFICE, AND SHARE A FILE FOR IMPORT/EXPORT RECORDS FOR LEIGH B. ALLEN, d.b.a., WOODLAND SPECIALISTS. A REVIEW OF THE FILES REVEALED THAT THE PRODUCT LOCATED AT SHIPPER'S EXPRESS WAS BROUGHT INTO THE PORT OF BIRMINGHAM ON JUNE 3, 2004 UNDER A TEMPORARY IMPORT BOND (T.I.B.). THE PRODUCT HAS REMAINED AT SHIPPER'S EXPRESS AWAITING EXPORT FIRST TO BRAZIL, THEN TO TEMA, GHANA. RECORDS SHOW THAT THE T.I.B. HAS EXPIRED RESULTING IN TWO FINES BEING ASSESS BY CUSTOMS AGAINST THE PRODUCT. MR. JENSEN STATED THAT THE T.I.B. HAD NOT BEEN RENEWED, AND THAT SHIPMENT HAD BEEN REPEATEDLY DELAYED BECAUSE ALL THE FORMS (SHIPPER'S DECLARATION FOR DANGEROUS GOODS) HAD NOT BEEN PROPERLY COMPLETED BY LEIGH ALLEN, d.b.a., WOODLAND SPECIALISTS. MR. JENSEN ALSO PROVIDED A COPY OF A MEMO FROM ALLEN TO EPA. THE TEXT OF THE MEMO INDICATES A POSSIBLE FOURTH SHIPMENT FROM CHINA. THE SHIPMENT MENTIONED IS FOR 2,3-Pyridinedicarboxylic Acid - 60% TO BE IMPORTED INTO THE PORT OF MOBILE, ALABAMA.

JERRY HAYNES - ACPS
 Investigator's Name & Title

Signature

0101
 Investigator's Number

IMPORT/EXPORT AGENT INSPECTION REPORT

06022 DOI 03/16/06 INSP# 0101 SEQ# 01 GRANT (Y) N DEPT (P) S O
 INSPECTION TYPE IMP REASON FOR INSPECTION FCA FACILITY FUNCTION NA USE SITE NA
 ACTIVITY INVOLVED. FED FACILITY N GRD WATER N WPS N ENDANGERED SPECIES N CANCELED/SUSPENDED N
 Interviewee: COOPER/T. SMITH STEVEDORING Credentials (Y) N
 Address: 118 NORTH ROYAL STREET (P.O. BOX 1566) Notice of Inspection (Y) N
 City/State/zip: MOBILE, ALABAMA 36633 (MOBILE, ALABAMA 36602-3603) Receipt for Samples Y (N)
 Phone: (251) 431 - 6100 COUNTY MOBILE Samples 0 Exhibits 0
 Complainant's Name: EPA REFFERAL #037-AL-06 Responsible Party: ANDY R. HARRIS
 Applicator Name: _____ Certification Number: _____ Exp. date: _____

1. Samples: (Sample Codes: CON - Product Container. DOC - Documentary; PES - Commercial Pesticide: PUD - Pesticide Use Dilution)

Sample Id Number	Code	EPA Reg Number	Brand Name	Active Ingredient

INTERVIEWEE IS A: Customhouse Broker: () Shipper: (X) Other: _____

1. EXHIBITS: What Was Obtained From the Interviewee? Statement () Confidential Records ()
 Customs Documents () Information (X) Other _____

2. If a Statement Was Not Collected, Describe the Document(s), Record(s), and/or Information Obtained:

A COPY OF A MEMO, OBTAINED FROM JENSEN SHIPPING COMPANY, INC., APPEARS TO INDICATE THAT LEIGH B. ALLEN, INTENDED TO IMPORT 2,3-Pyridinedicarboxylic Acid - 60% FROM CHINA THROUGH COOPER/T.SMITH IN MOBILE SOMETIME AFTER JUNE 21, 2004. THE PRODUCT APPEARED TO BE A HERBICIDE ACTIVE INGREDIENT, AND APPEARED TO BE A COMPANION SHIPMENT WITH THE METSULFURON METHYL 60% IMPORTED THROUGH THE PORT OF BIRMINGHAM AT ABOUT THE SAME TIME. NO OTHER RECORDS SHOWING THE SHIPMENT WERE FOUND, SO A FOLLOW-UP INSPECTION AT THE SHIPPER WAS UNDERTAKEN. ANDY R. HARRIS, RISK MANAGEMENT FOR COOPER/T. SMITH, CHECKED THE COMPANY'S RECORDS, AND COULD NOT FIND ANY REFERENCE TO THE ALLEGED SHIPMENT BEING HANDLED BY HIS COMPANY FOR LEIGH ALLEN OR WOODLAND SPECIALISTS (SELMA).

Y HAYNES - ACPS
 Investigator's Name & Title

Signature

0101

Investigator's Number

IMPORT/EXPORT AGENT INSPECTION REPORT

06022 DOI 03/16/06 INSP# 0101 SEQ# 02 GRANT (Y) N DEPT (P) S O
 INSPECTION TYPE IMP REASON FOR INSPECTION FCA FACILITY FUNCTION NA USE SITE NA
 ACTIVITY INVOLVED. FED FACILITY N GRD WATER N WPS N ENDANGERED SPECIES N CANCELED/SUSPENDED N
 Interviewee: U.S. CUSTOM AND BORDER PROTECTION Credentials (Y) N
 Address: 150 N. ROYAL STREET, SUITE 3004 (P.O. BOX 2748) Notice of Inspection Y (N)
 City/State/zip: MOBILE, ALABAMA 36602 (MOBILE, ALABAMA 36652) Receipt for Samples Y (N)
 Phone: (251) 441 - 6158 COUNTY MOBILE Samples 0 Exhibits 0
 Complainant's Name: EPA REFFERAL #037-AL-06 Responsible Party: MOLLY FRAZIER
 Applicator Name: _____ Certification Number. _____ Exp. date: _____

1. Samples: (Sample Codes: CON - Product Container. DOC - Documentary; PES - Commercial Pesticide: PUD - Pesticide Use Dilution)

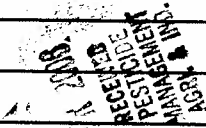
Sample Id Number	Code	EPA Reg Number	Brand Name	Active Ingredient

INTERVIEWEE IS A: Customhouse Broker: () Shipper: () Other: ENTRY SPECIALIST

1. EXHIBITS: What Was Obtained From the Interviewee? Statement () Confidential Records ()
 Customs Documents () Information (X) Other _____

2. If a Statement Was Not Collected, Describe the Document(s), Record(s), and/or Information Obtained:

ACCORDING TO U.S. CUSTOMS RECORDS, NEITHER LEIGH ALLEN NOR WOODLAND SPECIALISTS HAS IMPORTED OR EXPORTED ANYTHING FROM THE MOBILE PORT IN 2004, 2005 OR THUS FAR IN 2006.



RY HAYNES - ACPS
 Investigator's Name & Title

[Signature]
 Signature

0101
 Investigator's Number

IMPORT/EXPORT AGENT INSPECTION REPORT

06022 DOI 03/16/06 INSP# 0101 SEQ# 03 GRANT (Y) N DEPT (P) S O
 INSPECTION TYPE IMP REASON FOR INSPECTION FCA FACILITY FUNCTION NA USE SITE NA
 ACTIVITY INVOLVED. FED FACILITY N GRD WATER N WPS N ENDANGERED SPECIES N CANCELED/SUSPENDED N
 Interviewee: ALABAMA STATE DOCKS - BILLING Credentials (Y) N
 Address: STATE DOCKS BLVD (P.O. BOX 1588) Notice of Inspection Y (N)
 City/State/zip: MOBILE, ALABAMA 36633 (MOBILE, ALABAMA 36602-3603) Receipt for Samples Y (N)
 Phone: (251) 441 - 7043 COUNTY MOBILE Samples 0 Exhibits 0
 Complainant's Name: EPA REFFERAL #037-AL-06 Responsible Party: RICHARD LASCLO
 Applicator Name: _____ Certification Number: _____ Exp. date: _____

1. Samples: (Sample Codes: CON - Product Container. DOC - Documentary; PES - Commercial Pesticide: PUD - Pesticide Use Dilution)

Sample Id Number	Code	EPA Reg Number	Brand Name	Active Ingredient

INTERVIEWEE IS A: Customhouse Broker: () Shipper: () Other: STATE DOCKS - BILLING EMPLOYEE

1. EXHIBITS: What Was Obtained From the Interviewee? Statement () Confidential Records ()
 Customs Documents () Information (X) Other _____

2. If a Statement Was Not Collected, Describe the Document(s), Record(s), and/or Information Obtained:

ACCORDING TO STATE DOCKS RECORDS, NEITHER LEIGH ALLEN NOR WOODLAND SPECIALISTS HAS BEEN
BILLED FOR USE OF THE STATE DOCKS TO IMPORT ANYTHING IN 2004 OR 2005.

RECEIVED
 PESTICIDE
 MANAGEMENT
 APR 11 2006

RY HAYNES - ACPS
 Investigator's Name & Title

Signature

0101

Investigator's Number

PESTICIDE PRODUCER ESTABLISHMENT INSPECTION
Follow-up

CASE NUMBER: 06022

DATE OF INSPECTION: 04/09/07

PRODUCER: Woodland Specialists, Inc.,
Hangar 209 - Craig Field
Selma, Alabama 36701
(334) 872-6001

EPA EST. NUMBER: 81198-AL-01



REASON FOR INSPECTION: For Cause - EPA Referral inspection of unregistered imported pesticide product currently held for export at the Selma, Alabama location. The Temporary Import Bond (TIB) allowed by Customs has expired, and the product has not been exported.

CREDENTIALS AND RESPONSIBILITIES

On 04/09/07, in response to a referral from the U.S. Environmental Protection Agency, Inspector Dalton Brown and I visited the premises of the above listed company. I identified myself as an agent of the Commissioner of the Alabama Department of Agriculture & Industries and as a duly designated inspector for the U.S. Environmental Protection Agency by presenting my credentials to Steve Rogers, Vice President for Woodland Specialists, Inc. A *Notice of Inspection* was issued, and I explained the reason for my visit. An *Official Statement* was collected, and a *Notice of Suspension From Sale or Movement* was issued against 1,000 kg of metsulfuron methyl 60% currently held at the Selma location. Mr. Rogers was very cooperative.

POTENTIAL VIOLATION(S) FOUND

During the Producer Establishment Inspection at Woodland Specialists, Inc., the following potential violation(s) were noted:

1. The company had exceeded the time limit of the Temporary Import Bond (TIB) granted by the U.S. Customs Service for exporting the unregistered product, metsulfuron methyl 60%, which had been imported from the Peoples Republic of China.

SAMPLES

No further sampling of the product was undertaken at this time. Documentary samples were collected during the primary inspection.

SUMMARY

An inventory of the imported product appeared to indicate that the entire 1,000 kg was present at the Selma location. Mr. Rogers stated that his company has plans to dispose of the product through C-MAC Environmental Group, Inc., 402 Webster Chapel Road, Glencoe,

Alabama 35905. A Stop-Sale order was issued against the product until disposal arrangements are completed. Mr. Rogers was provided with my cell phone number, and told to contact me for a "Release" prior to movement or disposal of the product.

A follow-up inspection is planned shortly after disposal has been accomplished to collect copies of records to document that disposal has been completed. A full Producer Establishment Inspection will be conducted during that visit.

ATTACHMENTS

Narrative Report

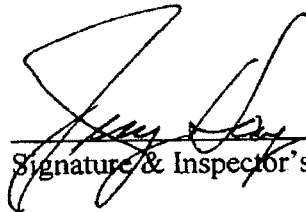
Pesticide Producer Establishment Inspection Report

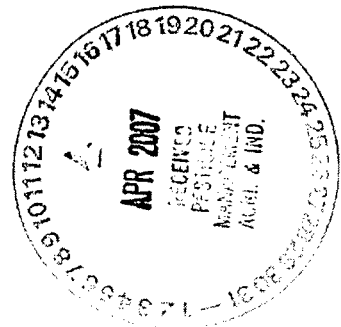
Official Statement of Steve Rogers (Exhibit A)

Notice of Suspension From Sale or Movement

Notice of Inspection

Jerry Haynes — ACPS
Inspector's Name & Title

 #0101
Signature & Inspector's Number



PESTICIDE PRODUCER ESTABLISHMENT INSPECTION REPORT

E# 06022 DOI 04/09/07 INSP# 0101 SEQ# 01 GRANT (Y)/N DEPT (P)/S/O
 INSPECTION TYPE PEI REASON FOR INSPECTION FC FACILITY FUNCTION NA USE SITE NA
 ACTIVITY INVOLVED: FED FACILITY N GRD WATER N WPS N ENDANGERED SPECIES N CANCELED/SUSPENDED N
 Firm Name: WOODLAND SPECIALISTS, INC. (LEIGH B. ALLEN) Credentials (Y)/N
 Address: HANGAR 209 - CRAIG FIELD Notice of Inspection (Y)/N
 City/State/zip: SELMA, ALABAMA 36701 Receipt for Samples Y/(N)
 Phone: (334) 872-6001 COUNTY DALLAS Samples 0 Exhibits 5
 EPA ESTABLISHMENT NUMBER: 81198-AL-001 Time: In _____ Out _____

1. Samples: (Sample Codes: CON - Product Container; DOC - Documentary; PES - Commercial Pesticide; OTH - Other)

Sample Id Number	Code	EPA Reg Number	Brand Name	Active Ingredient

2. Establishment Official(s) Interviewed/Title/Responsibilities/Phone Numbers:

(1.) STEVE ROGERS - VICE PRESIDENT, TOTALLY RESPONSIBLE FOR OPERATIONS - 334-872-6001

(2.) _____

(3.) _____

3. Establishment Organizational Information:

(1.) Corporate/Company Officers Names, Titles, Responsibilities & Phone Numbers:

(A.) LEIGH B. ALLEN - PRESIDENT, TOTALLY RESPONSIBLE FOR OPERATIONS - 334-872-6001

(B.) STEVE ROGERS, OPERATIONS MANAGER,

(C.) _____

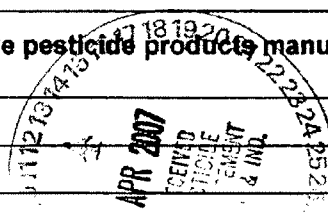
(2.) Related Firms (Names & Addresses): NONE

(3.) What is the primary function of the Establishment? (A.) Registrant ☐ (B.) Primary Production Facility ☐
 (C.) Repackage (small quantity) ☐ (D.) Bulk Repackage ☐ (E.) Other: IMPORT/EXPORT

4. Guarantees and Labeling Agreements (NOTE: If yes, list firm name/address/product/EPA Reg. No.)

(1.) Does the Establishment manufacture/label/package pesticide products for other registrants? Y/(N) NA

(2.) Does the Establishment have pesticide products manufactured/labeled/packaged by another firm? Y/(N) NA



(3.) Does the Establishment have Supplemental Labeling agreement(s) with other firms?

Y / ☒ N / NA

(4.) Does the Establishment have repackaging agreement(s) with other firms?

Y / ☒ N / NA

5. Import, Export & Experimental Use Permit (EUP) Activities:

(1.) Does the Establishment currently import any pesticides products?

Y / ☒ N / NA

(2.) Does the Establishment currently export pesticides products?

Y / ☒ N / NA

(3.) Does the Establishment currently produce one or more EUP pesticide products?

Y / ☒ N / NA

(4.) If yes on any of the above, do products comply with the appropriate FIFRA Requirements?

Y / N / ☒ NA

If no, explain & Notes: PEOPLES REPUBLIC OF CHINA IMPORT PRODUCT IS UNREGISTERED AND WAS IMPORTED UNDER T.I.B. FOR PROCESSING AND EXPORT ONLY.

6. Books and Records:

(1.) Does the Establishment comply with FIFRA provisions by maintaining pesticide production, sales, shipping and receiving records as detailed under FIFRA Section 7, Section 6 (a) (2) and 40 CFR Part 169?

Y / ☒ N / NA

If no, explain: FOLLOW-UP INSPECTION IS PLANNED TO COMPLETE REVIEW OF RECORDS

(2.) Was the Part 169 Requirements Summary Sheet provided to and discussed with management?

Y / ☒ N / NA

(3.) Does the Disposal File comply with all of the requirements of 40 CFR Part 169?

☒ Y / N / NA

If no, explain & Notes: _____

7. Customer Complaint File:

(1.) Does the Establishment maintain a file of Customer Complaints received regarding its products?

Y / N / ☒ NA

8. Bulk Pesticides:

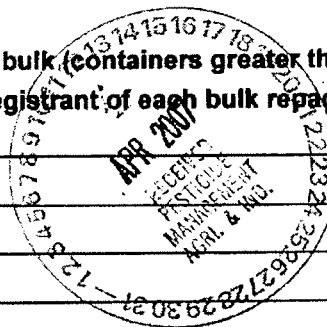
(1.) Does the Establishment package/repackage pesticides in bulk (containers greater than 55 gallons)?

Y / ☒ N / NA

(2.) Does the Establishment have written contracts with the registrant of each bulk repackaged product?

Y / N / ☒ NA

Notes: _____



9. Child Resistant Packaging (CRP) Requirements:

(1.) Are all products subject to 40 CFR Part 157 - Subpart packaged in CRP?

Y / N / ☒ NA

(2.) Does Establishment maintain CRP manufacturer's documentation on file for utilized CRP?

Y / N / ☒ NA

Product Manufacturing Codes:

(1.) Does the Establishment utilize manufacturing codes (batch or lot numbers) on its products?

Y / ☒ NA

If yes, give an example of the code & explain: _____

11. Reviews of Pesticide Products Packaged, Labeled and Released for Shipment:

(1.) Number of products currently produced by this location?

1

(2.) Number of products reviewed during this inspection?

1

(3.) Does the Establishment produce products which require 40 CFR Part-156 (Subpart K) labeling?

Y / N / ☒ NA

(a.) If YES, does the product label contain the following 40 CFR Part-156 (Subpart K) statements?

(1) 40 CFR Part 170 Reference?

Y / N

(5) REI Statement?

Y / N

(2) Application Restrictions?

Y / N

(6) Product Type Identification?

Y / N / NA

(3) Spanish Warning?

Y / N / NA

(7) PPE Statement?

Y / N

(4) State Restrictions Statement?

Y / N

(8) Notification To Workers?

Y / N

(4.) Do reviewed product labels appear to comply with provisions of FIFRA & 40 CFR Part-156?

Y / ☒ NA

(If no, list products and discrepancies): UNREGISTERED CHINESE PRODUCT WAS IMPORTED UNDER T.I.B.

FOR PROCESSING AND EXPORT ONLY. THE CONTAINERS ARE NOT LABELED.

12. Consignees of products which are not available for sampling and inspection:(1.) Does Establishment have inventory of all pesticides produced over the preceding one year period? Y / ☒ NA

If no, list the product & name and address of recent consignees: _____

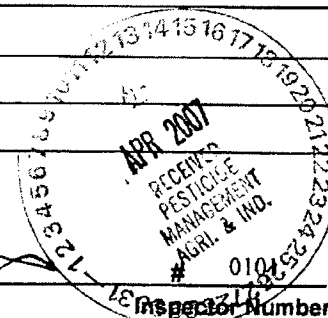
13. Corrective Action(s), Discussions with Management and Notes: 1,000 kg OF IMPORTED "METSULFURON METHYL 60.0%" IS CURRENTLY STORED AT HANGAR 209 - CRAIG FIELD, SELMA, ALABAMA. THE PLANNED EXPORT TO TEMA, GHANA WAS CANCELED, AND THE TEMPORARY IMPORT BOND (TIB) HAS EXPIRED. THE COMPANY MUST DISPOSE OF THE PRODUCT. AS PER INSTRUCTIONS, A STOP-SALE WAS ISSUED AGAINST THE PRODUCT UNTIL DISPOSAL ARRANGEMENT CAN BE MADE BY THE COMPANY. MR. ROGERS WAS PROVIDED WITH MY CELL PHONE NUMBER FOR REQUESTING A "RELEASE" PRIOR TO MOVING OR DISPOSING OF THE PRODUCT.

ERRY HAYNES

ACPS

Inspector's Name & Title

Signature



Inspector Number



STATE OF ALABAMA
DEPARTMENT OF AGRICULTURE & INDUSTRIES
OFFICIAL STATEMENT

File No.
(If applicable)
CASE #06022
EXHIBIT A

State
ALABAMA

County
DALLAS

City
SELMA

STEVE ROGERS

IN THE PRESENCE OF

JERRY HAYNES

Inspector for the Alabama Department of Agriculture and Industries do hereby make the following statement:

I AM THE VICE PRESIDENT OF WOODLAND SPECIALISTS, INC., HANGAR 209 CRAIG FIELD, SELMA, ALABAMA 36701. I AM TOTALLY RESPONSIBLE FOR THE OPERATIONS OF THIS FIRM.

ON JUNE 9, 2004 40 - 25 KG FIBRE DRUMS OF METSULFURON METHYL 60% ENTERED THE UNITED STATES VIA AIR CHINA THROUGH THE BIRMINGHAM AIRPORT (ENTRY #AM3-0408703-5) FROM JIANGSU CHANGLONG CHEMICALS CO, LTD, LONGHU TANG, NEW DISTRICT OF CHANGZHOU, JIANGSU, P.R. CHINA (EPA ESTABLISHMENT #74134-CHN-001). THE PRODUCT WAS REPORTED AS "T.I.B. FOR PROCESSING AND EXPORT ONLY." OUR EXPORT DEAL TO NEKOTECH CENTER TEMA BRANCH A/31 PAA GRANT CLOSE, PO BOX 77, OPPOSITE COURTESY INTERNATIONAL HOTEL COMMUNITY 10 TEMA GHANA WEST AFRICA 233-2230-6363 (p) ATT: PRINCESS ASIE OCANSEY HAS BEEN CANCELED, AND OUR CURRENT PLANS ARE TO DISPOSE OF THE PRODUCT THROUGH C-MAC ENVIRONMENTAL GROUP, INC., 402 WEBSTER CHAPEL ROAD, GLENCOE, ALABAMA 35905. AT THIS TIME THE PRODUCT IS STORED AT OUR WAREHOUSE IN SELMA, AND CONSISTS OF 1,000 KG OF GRANULAR METSULFURON METHYL 60% PACKAGED IN 687 - 1 GALLON CONTAINERS.

S.R.

I hereby certify that I have read the above statement and it is true and correct.

SIGNATURE

VICE PRESIDENT

TITLE

FIRM/INDIVIDUAL Name and address (Zip Code)

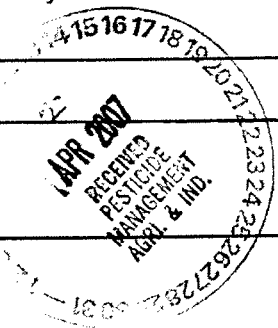
WOODLAND SPECIALIST, INC., HANGAR 209 - CRAIG FIELD, SELMA, ALABAMA 36701

I hereby certify this statement was made and signed by STEVE ROGERS

and in my presence on this 9th day of

APRIL 20 07

Signature of Inspector



Original - Department
1. Establishment
2. Inspector



STATE OF ALABAMA
DEPARTMENT OF AGRICULTURE AND INDUSTRIES
BEARD BUILDING
P. O. BOX 3336
MONTGOMERY, ALABAMA 36109-0336



NOTICE OF SUSPENSION FROM SALE OR MOVEMENT

NAME OF FIRM: WOODLAND SPECIALISTS, INC.

DATE: 04/09/07

ADDRESS: HANGAR 209 - CRAIG FIELD, SELMA, ALABAMA 36701

SAMPLE NO.: 03070601010101 & 02

The undersigned official representative of the Commissioner of Agriculture and Industries has reasonable cause to believe that the following described items are adulterated, misbranded, or otherwise not in compliance with Laws of Alabama Relating to Agriculture, Code of Alabama (1975).

Description of Article: METSULFURON METHYL 60% (NOT A REGISTERED PRODUCT IN THE USA)

Amount Suspended from Sale: 687 - 1 GALLON POLY JUGS

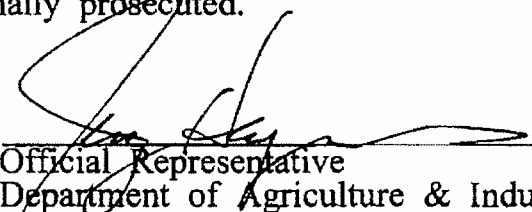
Location after Suspension: COMPANY WAREHOUSE LOCATED AT HANGAR 209 - CRAIG FIELD, SELMA, ALABAMA 36701

Reason for Suspension: EXPORTER HAS FAILED TO EXPORT UNREGISTERED PESTICIDE PRODUCT WITHIN THE TIME PERIOD ALLOWED BY THE TEMPORARY IMPORT BOND (TIB) ISSUED BY THE U.S. CUSTOM SERVICES. AS A DIRECT RESULT THE PRODUCT APPEARS TO BE HELD ILLEGALLY BY THE COMPANY AT THE SELMA, ALABAMA LOCATION

Under the provisions of Section 2-2-30, Code of Alabama (1975), you are hereby ordered to withhold from sale and to neither move, transport nor otherwise dispose of the articles identified above without written authorization from the Commissioner of Agriculture and Industries or his authorized representative. Failure to abide by this order could result in your being criminally prosecuted.


VICE PRESIDENT

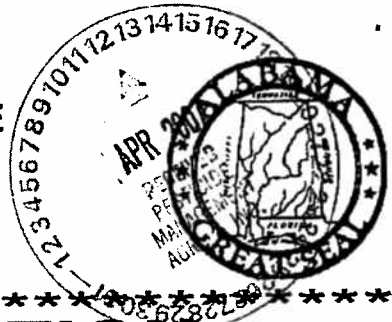
Signature & Title of Person
Receiving Notice


Official Representative
Department of Agriculture & Industries



STATE OF ALABAMA
DEPARTMENT OF AGRICULTURE
AND INDUSTRIES

BEARD BUILDING
P.O. BOX 3336
MONTGOMERY, ALABAMA 36109-0336



NOTICE OF INSPECTION

Date of Inspection: 04/9/07	Hour: 2:00 AM <input checked="" type="radio"/> PM
Name of Individual STEVE ROGERS	Title VICE PRESIDENT
(Firm, Farmer, Homeowner, etc.) WOODLAND SPECIALIST, INC (334) 872-6001	Address HANGAR 209, CRAIG FIELD SELMA, ALABAMA 36701
CASE # 06022	

Reason for Inspection:

1. ☒ Compliance with Chapter 27 & 28, Title 2, Code of Alabama (1975) and Chapter 80-1-13, 80-10-9, Alabama Administrative Code.
2. ☐ For the purpose of inspecting sites where pesticides are being used or have been used to collect data on the use of pesticides and to determine whether pesticides are or have been used consistent with their labeling.
3. ☒ For the purpose of inspecting and obtaining samples of any pesticides or devices packaged, labeled, and released for shipment, and samples of any containers or labeling for such pesticides or devices in places where pesticides or devices are held for distribution or sales. FIFRA Sec. 9(a) and 12(a)(2)(B)).
4. ☒ For the purpose of inspecting and obtaining copies of those records specified in FIFRA Section 8 and 40 CFR Part 169 (Sec. 8 & 12(a)(2)(B)).
5. ☐ To inspect and obtain copies of records regarding sale, distribution, or disposal of pesticides and/or containers including labels, labeling and literature.
6. ☒ Violation suspected: FAILURE TO EXPORT AN UNREGISTERED PESTICIDE PRODUCT
WITHIN THE TIME ALLOWED UNDER A TEMPORARY IMPORT BOND (TIB).

Signature of Inspector

ACPS #0101

Title

Authority for conducting inspection contained in Title 2, Code of Alabama (1975 and/or regulations promulgated thereunder.



STATE OF ALABAMA
DEPARTMENT OF AGRICULTURE
AND INDUSTRIES

BEARD BUILDING
P.O. BOX 3336
MONTGOMERY, ALABAMA 36109-0336



***** SAMPLE COLLECTION REPORT *****

FACILITY

Point of Collection: Company ☒ Homeowner ☐ Other ☐

Name SHIPPERS EXPRESS Date 03/07/06

Address 2450 PINSON VALLEY PARKWAY City BIRMINGHAM

State ALABAMA Zip Code 35217 Phone (205) 849-0093

SAMPLE(S) INFORMATION

Sample # 03070601010101 & 02 Type: DOC

Description: Ag Follow-Up ☐ Non-Ag Follow-Up ☐ Ag Use ☐
Non-Ag Use ☐ PEI ☒ DL ☐ MK ☐ Other ☐

PESTICIDE (S) BRAND NAME METSULFURON METHYL 60% WDG

EPA REG. NO. NONE EPA Est. No. NONE

LOT/BATCH NO. Amount at Sampling:

SAMPLE(S) IDENTIFICATION:

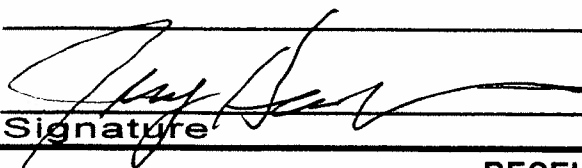
SAMPLE ID#03070601010101 - PHOTOGRAPHS OF 1 (OF 121 CASES) CASE PACKAGING AND LABELING AND ONE OF FOUR APPROXIMATELY ONE GALLON CONTAINERS IN THE CASE PACKAGING OF AN UNIDENTIFIED GRANULAR PRODUCT (LIGHT BROWN OR YELLOW IN COLOR) BELIEVED TO BE METSULFURON METHYL 60% WDG REPACKAGED INTO BOXES BY SHIPPERS EXPRESS AS PER VERBAL ORDER OF LEIGH ALLEN (WOODLAND SPECIALISTS, INC. - SELMA)

SAMPLE ID#03070601010102 - PHOTOGRAPHS 30 CASES (4 - 1 GALLONS PER CASE) LABELED METSULFURON METHYL 60% WDG THAT HAD BEEN PACKAGED FOR EXPORT TO GHANA BY OF WOODLANDS SPECIALISTS, INC. AND DELIVERED TO SHIPPERS EXPRESS BY LEIGH ALLEN VIA HIS VEHICLE ON AUGUST 10, 2005.

RELATED SAMPLES: NONE

REASON FOR COLLECTION(S): TO DOCUMENT REPACKAGING OF UNREGISTERED IMPORTED PESTICIDE PRODUCT BY AN UNREGISTERED PESTICIDE PRODUCER ESTABLISHMENT.

REMARKS:

Signature 

ACPS
Title

#0101
ID. NUMBER

RECEIVED
PESTICIDE
MANAGEMENT
AGRI & IND.

RECEIPT OF SAMPLES

The above described sample(s) was/were collected by the Alabama Department of Agriculture and Industries and receipt is hereby acknowledged

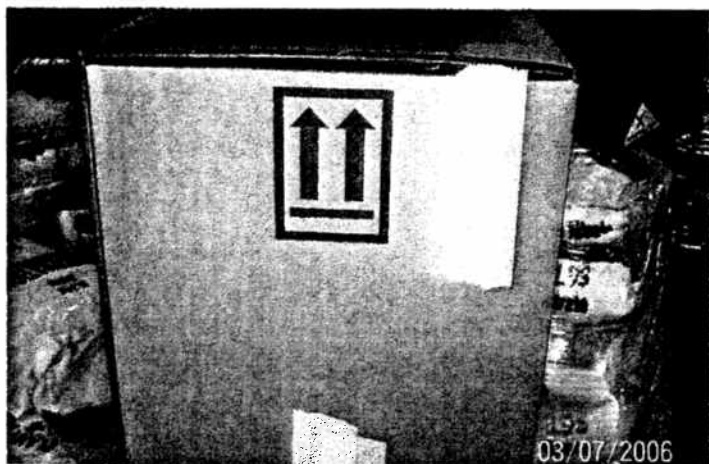
Signature and Title  TERMINAL MGR.

X JAMES ALEXANDER
Print Name

PHOTOGRAPHS WITH CAPTIONS

CASE #: 06022 DOI: 03/07/06 INSP.#: 0101 SEQ.#: 01 EXHIBIT: — Page 1 of 6

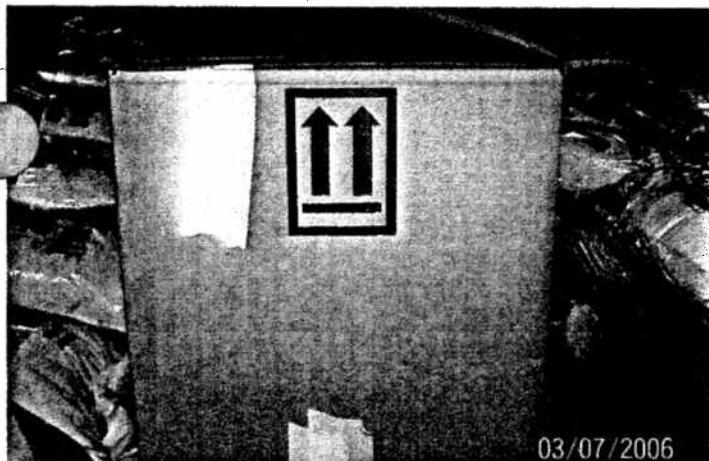
COLLECTION SITE: Shipper's Express, 2450 Pinson Valley Parkway, Birmingham, Alabama 36217



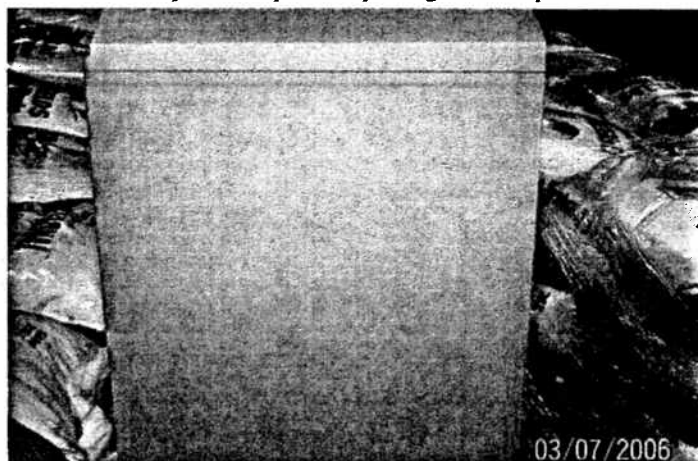
1. Doc Sample 03070601010101 - side view of 1 of 121 cases of unidentified pesticide product packaged for export.



2. Doc Sample 03070601010101 - side view of 1 of 121 cases of unidentified pesticide product packaged for export.



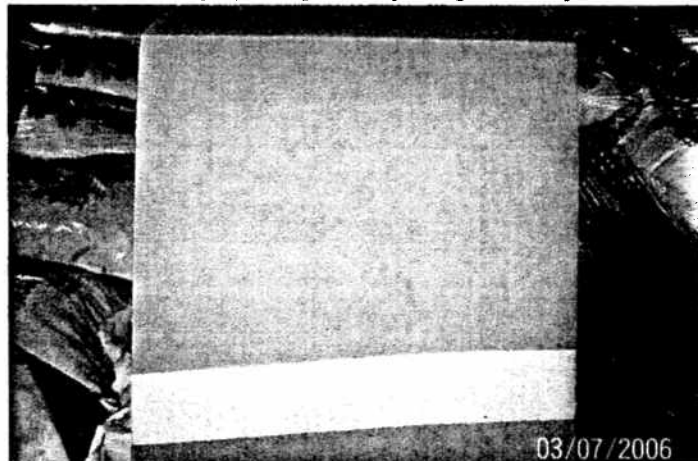
3. Doc Sample 03070601010101 - side view of 1 of 121 cases of unidentified pesticide product packaged for export.



4. Doc Sample 03070601010101 - side view of 1 of 121 cases of unidentified pesticide product packaged for export.



5. Doc Sample 03070601010101 - bottom view of 1 of 121 cases of unidentified pesticide product packaged for export.



6. Doc Sample 03070601010101 - top view of 1 of 121 cases of unidentified pesticide product packaged for export.

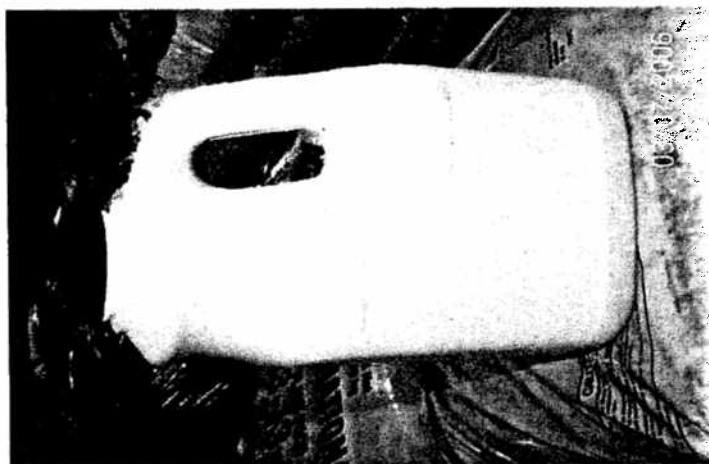
PHOTOGRAPHS WITH CAPTIONS

CASE #: 06022 DOI: 03/07/06 INSP.#: 0101 SEQ.#: 01 EXHIBIT: = Page 2 of 6

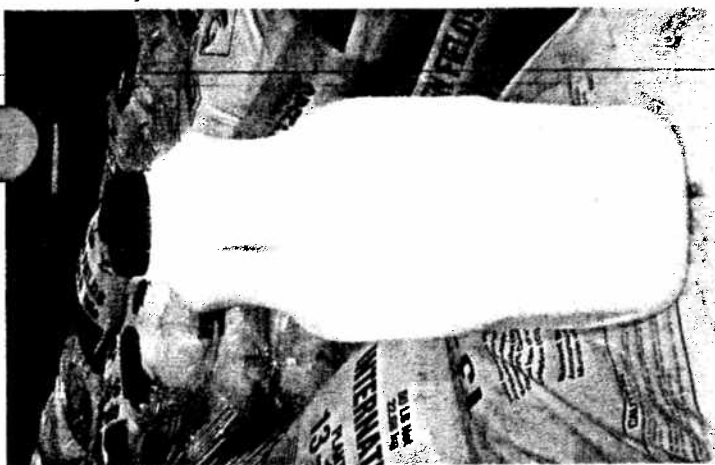
COLLECTION SITE: Shipper's Express, 2450 Pinson Valley Parkway, Birmingham, Alabama 36217



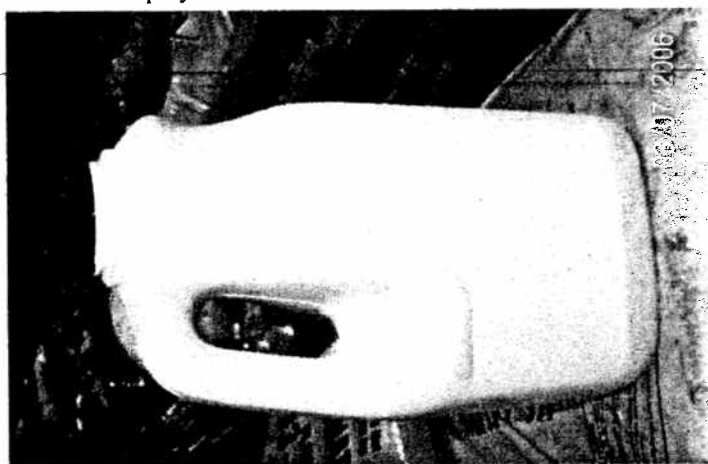
7. Doc Sample 03070601010101 - top view of 1 of 121 cases of unidentified pesticide showing packaging of 4 - 1 gal/case.



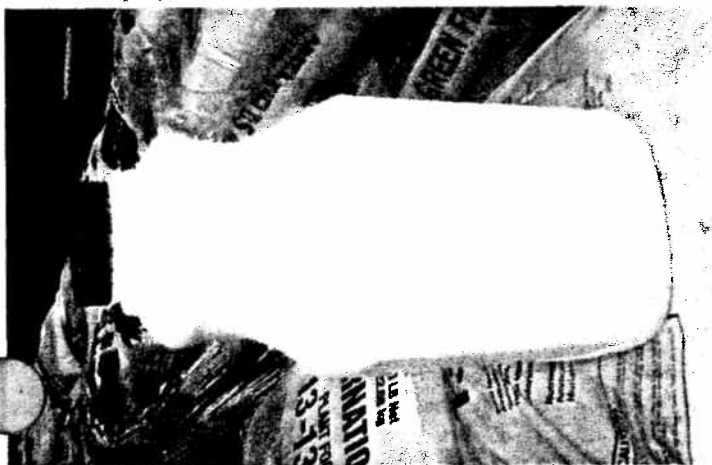
8. Doc Sample 03070601010101 - side view of 1- 1 gal unlabeled poly container from 1 of the 121 cases.



9. Doc Sample 03070601010101 - side view of 1- 1 gal unlabeled poly container from 1 of the 121 cases.



10. Doc Sample 03070601010101 - side view of 1- 1 gal unlabeled poly container from 1 of the 121 cases.



11. Doc Sample 03070601010101 - side view of 1- 1 gal unlabeled poly container from 1 of the 121 cases.

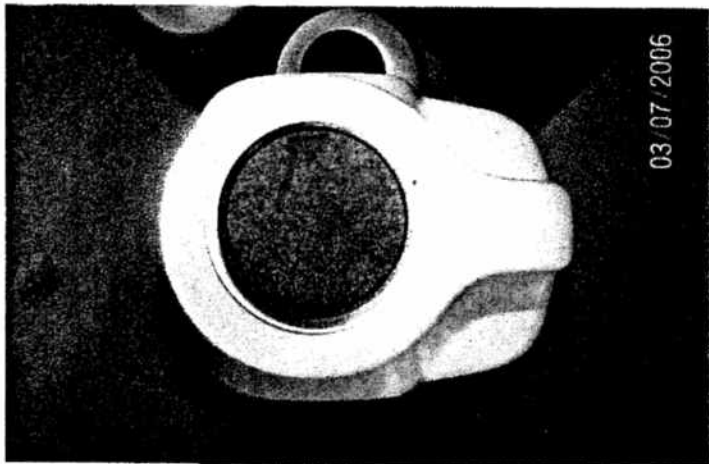


12. Doc Sample 03070601010101 - bottom view of 1- 1 gal unlabeled poly container from 1 of the 121 cases.

PHOTOGRAPHS WITH CAPTIONS

CASE #: 06022 DOI: 03/07/06 INSP.#: 0101 SEQ.#: 01 EXHIBIT: — Page 3 of 6

COLLECTION SITE: Shipper's Express, 2450 Pinson Valley Parkway, Birmingham, Alabama 36217



13. Doc Sample 03070601010101 - top view (cap on) of 1- 1 gal unlabeled poly container from 1 of the 121 cases.



14. Doc Sample 03070601010101 - top view (cap off) of 1- 1 gal unlabeled poly container from 1 of the 121 cases.



15. Doc Sample 03070601010102 - side view of 1 of 30 cases of the product, Metsulfuron Methyl 60%, packaged for export.



16. Doc Sample 03070601010102 - side view of 1 of 30 cases of the product, Metsulfuron Methyl 60%, packaged for export.



17. Doc Sample 03070601010102 - side view of 1 of 30 cases of the product, Metsulfuron Methyl 60%, packaged for export.

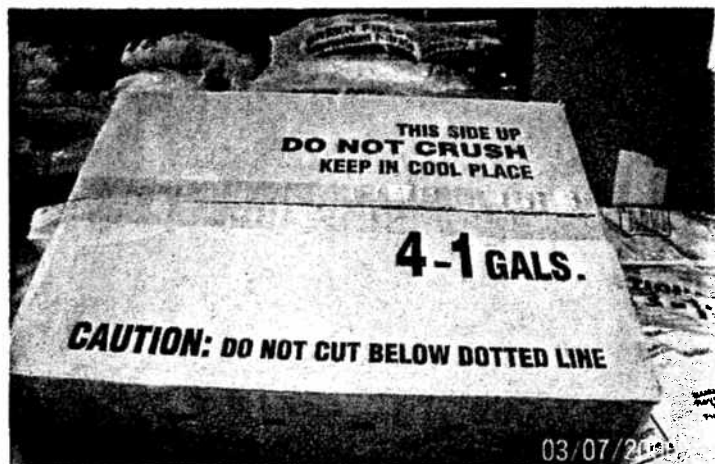


18. Doc Sample 03070601010102 - side view of 1 of 30 cases of the product, Metsulfuron Methyl 60%, packaged for export.

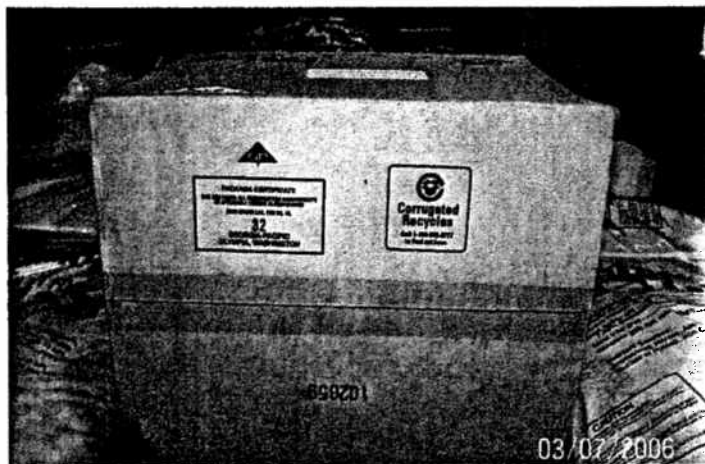
PHOTOGRAPHS WITH CAPTIONS

CASE #: 06022 DOI: 03/07/06 INSP.#: 0101 SEQ.#: 01 EXHIBIT: — Page 4 of 6

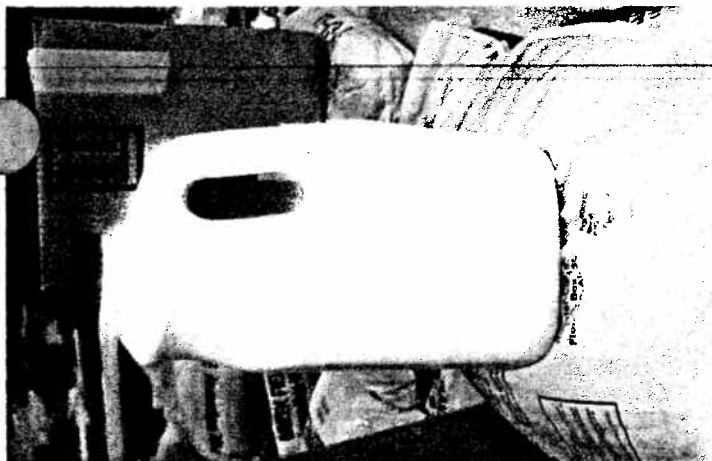
COLLECTION SITE: Shipper's Express, 2450 Pinson Valley Parkway, Birmingham, Alabama 36217



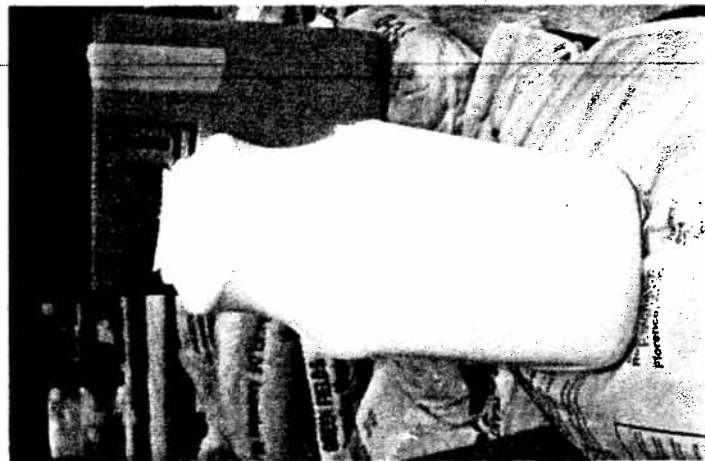
19. Doc Sample 03070601010102 - top view of 1 of 30 cases of the product, Metsulfuron Methyl 60%, packaged for export.



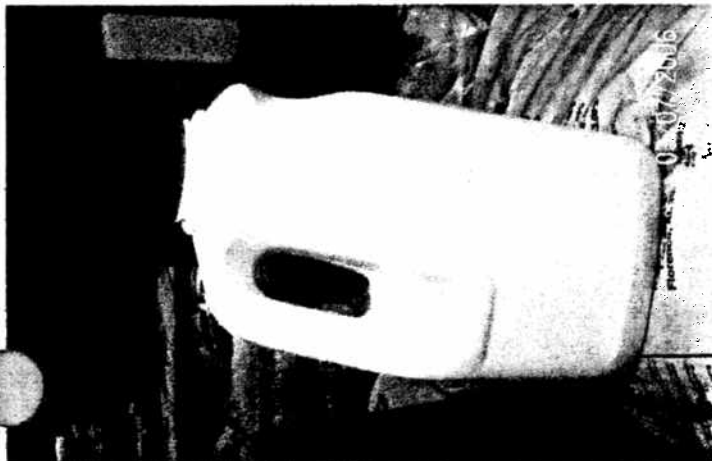
20. Doc Sample 03070601010102 - bottom view of 1 of 30 cases of the product, Metsulfuron Methyl 60%, packaged for export.



21. Doc Sample 03070601010102 - side view of 1- 1 gal unlabeled poly container from 1 of 30 cases.



22. Doc Sample 03070601010102 - side view of 1- 1 gal unlabeled poly container from 1 of 30 cases.



23. Doc Sample 03070601010102 - side view of 1- 1 gal unlabeled poly container from 1 of 30 cases.

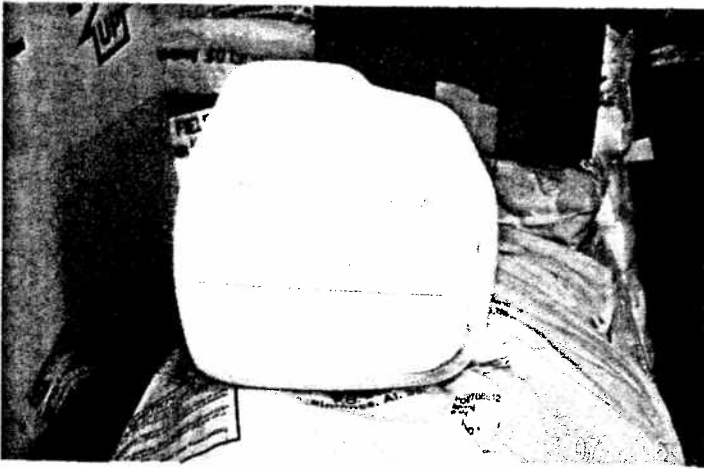


24. Doc Sample 03070601010102 - side view of 1- 1 gal unlabeled poly container from 1 of 30 cases.

PHOTOGRAPHS WITH CAPTIONS

CASE #: 06022 DOI: 03/07/06 INSP.#: 0101 SEQ.#: 01 EXHIBIT: — Page 5 of 6

COLLECTION SITE: Shipper's Express, 2450 Pinson Valley Parkway, Birmingham, Alabama 36217



25. Doc Sample 03070601010102 - bottom view of 1- 1 gal unlabeled poly container from 1 of 30 cases.



26. Doc Sample 03070601010102 - top view (cap on) of 1- 1 gal unlabeled poly container from 1 of 30 cases.



27. Doc Sample 03070601010102 - top view (cap off) of 1- 1 gal unlabeled poly container from 1 of 30 cases.



28. Doc Sample 03070601010102 - shows the view of 4 - 1 gal unlabeled poly containers in 1 of 30 cases.



29. Shows a view of the 151 "shrink wrapped" cases of product packaged, labeled and released for export.

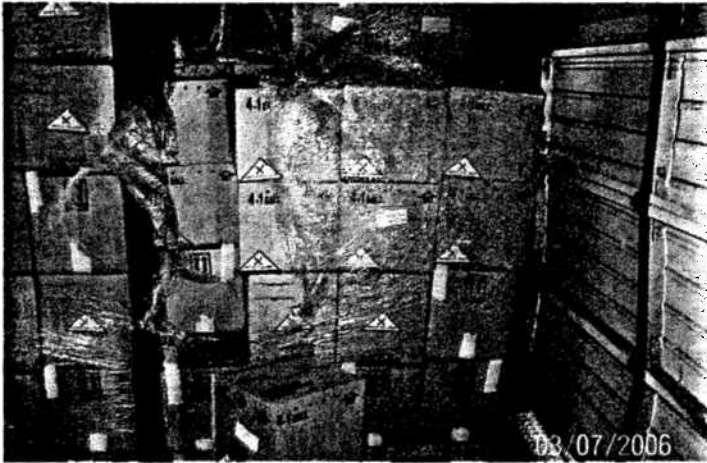


30. Shows a view of the 151 "shrink wrapped" cases of product packaged, labeled and released for export.

PHOTOGRAPHS WITH CAPTIONS

CASE #: 06022 DOI: 03/07/06 INSP.#: 0101 SEQ.#: 01 EXHIBIT: — Page 6 of 6

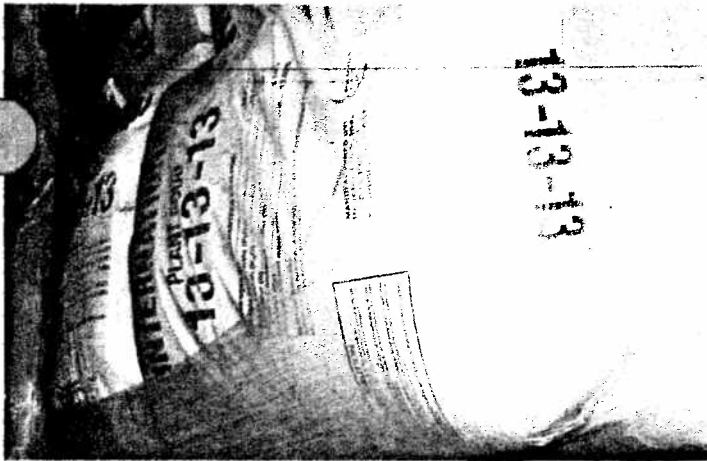
COLLECTION SITE: Shipper's Express, 2450 Pinson Valley Parkway, Birmingham, Alabama 36217



31. Shows a view of the 151 "shrink wrapped" cases of product packaged, labeled and released for export



32. Shows the 20 "shrink wrapped" cases of AgriSolutions Atrazine 4L (EPA 1381-158) for export.



33. Shows the labeling on 1 - 50 pound bag of 13-13-13 fertilizer for export.



34. Shows the labeling on 1 - 50 pound bag of 34-0-0 Ammonium Nitrate fertilizer for export.



EXHIBIT C
03/09/06
JH.

Hangar 209 Craig Field,
Phone: 334-872-6001

Selma, AL 36701
Fax: 334-874-3948

FAX COVER SHEET

To: Mark Bloeth
Company: US EPA
Fax No: 404-562-8973

From: Leigh Allen Date: 1-23-06
Fax No: 334-874-3948

Pages (including cover sheet) 4

☒ Urgent

☐ For Review

☐ Please Comment

☐ Please Reply

Message:

REC'D
PESTICIDE
MANAGEMENT
10/21/06

W4



Hangar 209 Craig Industrial Park
Phone: (334) 872-6001

Selma, Alabama 36701
Fax: (334) 874-3948

February 23, 2006

Mark Bloeth
US EPA
VIA FACSIMILE: 404-562-8973

Dear Sir:

In compliance with the consent decree between the US EPA and Woodlands Specialists, Inc., the following actions were taken with regards to the subject herbicide:

As per the instructions from C-MAC Environmental, we transferred the herbicide from 120 (25 kg) cardboard drums into 16 (55 gallon) plastic drums and sealed the bung holes. These drums were transferred to C-MAC in August of 2005 with instructions to destroy in accordance with EPA regulations.

Sincerely,

Leigh B. Allen, President

APR 2006
REC'D
PESTICIDE
MANAGEMENT
AGRI & ENV



C-MAC ENVIRONMENTAL GROUP, INC.

FACILITY EPA ID: ALD981020894

WOODLANS SPECIALISTS, INC.
HANGER 209 CRAIG FIELD
SELMA, AL 36701-

Site Id: CESQG

CERTIFICATE OF DISPOSAL

C-MAC Environmental Group, Inc, has received Waste Material from WOODLANS SPECIALISTS, INC. as described on the Generator's Manifest Document 41768 (and State Manifest 241768) on Friday, August 12, 2005.

C-MAC Environmental Group, Inc. hereby certifies that the Waste Material identified above was received and disposed in compliance with State and Federal Regulations.

AUTHORIZED: Mary Anne Brock

DATE: 9/2/05

W

C-MAC ENVIRONMENTAL GROUP, INC.
402 WEBSTER CHAPEL ROAD
GLENCOE, ALABAMA 35905
TEL: 256-492-8340
FAX: 256-492-8395

VISIT US ON THE WEB @ WWW.CMACGROUP.COM

C-MAC ENVIRONMENTAL GROUP, INC.
P.O. Box 880
DAPHNE, ALABAMA 36526
TEL: 251-626-7600
FAX: 251-626-7111

Emergency Contact Telephone Number

UNIFORM HAZARDOUS
WASTE MANIFEST1. Generator's US EPA ID No.
C E S Q GManifest
Document No. 917682. Page 1
of 1Information in the shaded areas is
not required by Federal law.3. Generator's Name and Mailing Address
WOODLAND SPECIALISTS, INC.
HANGER 209 CRAIG FIELD
SELMA, AL 36701-

A. State Manifest Document Number

C-MAC 241768

B. State Generator's ID

4. Generator's Phone (334) 872-6001

5. Transporter 1 Company Name

SKELTON TRUCKING LLC.

6. US EPA ID Number

C. State Transporter's ID

D. Transporter's Phone (334) 872-4878

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

C-MAC ENVIRONMENTAL GROUP, INC.
402 WEBSTER CHAPEL RD
GLENCOE, AL 35905

10. US EPA ID Number

A L D 9 8 1 0 2 0 8 9 4

G. State Facility's ID

ALD981020894

H. Facility's Phone

(256) 492-8340

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

(HM)

HERBICIDE. RCRA & DOT NON-HAZARDOUS/NON-REGULATED.

12. Containers

No.

Type

13.
Total
Quantity14.
Unit
Wt/Vol15.
Waste No.

a.

88220

16

DM

00880

G

N/A

b.

c.

d.

APR 2008
RECEIVED
PELCO
MANAGEMENT
AGRI & IND.

J. Additional Descriptions for Materials Listed Above

AL

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

MR. LEIGH ALLEN/ (334) 872-6001

129976/

CD

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Steve Rogers

Signature

Month Day Year

08 12 05

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Wimberly Thomas

Signature

Month Day Year

08 12 05

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

up

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

MX Brock

Signature

Month Day Year

08 12 05

TRANSMISSION VERIFICATION REPORT

TIME : 02/23/2006 09:56
NAME : WOODLANDS SPECIALIST
FAX : 3348743948
TEL : 3348726001
SER.# : 000K5J910315

DATE, TIME	02/23 09:55
FAX NO./NAME	14045628973
DURATION	00:01:19
PAGE(S)	04
RESULT	OK
MODE	STANDARD
	ECM

APR 2006
RECEIVED
PESTICIDE
MANAGEMENT
AGRI. & IND.

WLB

United States Environmental Protection Agency Washington, DC 20460 Notice of Arrival of Pesticides and Devices Send Completed Form to Appropriate Regional Office Listed on the Reverse of this Form.		Official File Copy Date: 6/24/74 Signature and Title of EPA Official: <i>[Signature]</i>	
Part I: To Be Completed by Importer or Agent 1. Name and Complete Address of Broker or Agent: LEIGH B ALLEN, 45 HERKLEY CIRCLE, HANOVER, 209 CRAIG FIELD, SEVEN, N.Y. 35701 2. Name and Complete Address of Importer or Consignor: <i>[Blank]</i> 3. EPA Producer Establishment No.: 74134-GM-001 4. EPA Registration Number: <i>[Blank]</i> 5. Brand name of Product: <i>[Blank]</i>		Part II: To Be Completed by U.S. Customs Service 6. Entry Number: AK3-0408703-5 7. Location of Goods for Examination after Importation: BIRMINGHAM, AL 8. Entry Date: 6/9/04 9. Total Net Weight: 1,115 kgs 10. Quantity: 40 11. Unit Size: kgs 12. Part of Entry: 40 13. Country of Origin: CHINA 14. Carrier: AIR CHINA 15. Country of Origin: CHINA 16. Assent that information consisting Confidential Business Information is shown in the above blocks numbered: (Note: Blocks 4, 5, 6, 7 are not entered to CBI treatment - see instructions)	
Part III: To Be Completed by U.S. Customs Service 17. Location of Goods for Examination after Importation: BIRMINGHAM, AL 18. Entry Number: AK3-0408703-5 19. Location of Goods for Examination after Importation: BIRMINGHAM, AL 20. Entry Date: 6/9/04 21. Total Net Weight: 1,115 kgs 22. Quantity: 40 23. Unit Size: kgs 24. Part of Entry: 40 25. Country of Origin: CHINA 26. Carrier: AIR CHINA 27. Country of Origin: CHINA 28. Assent that information consisting Confidential Business Information is shown in the above blocks numbered: (Note: Blocks 4, 5, 6, 7 are not entered to CBI treatment - see instructions)		Part IV: To Be Completed by U.S. Customs Service 29. Signature of Importer or Agent: <i>[Signature]</i> 30. Date Signed: 6/11/04 31. Signature of Broker or Agent: <i>[Signature]</i> 32. Date Signed: 6/24/74 33. Signature and Title of EPA Official: <i>[Signature]</i>	
Part V: To Be Completed by U.S. Customs Service 34. Signature of Importer or Agent: <i>[Signature]</i> 35. Date Signed: 6/24/74 36. Signature and Title of EPA Official: <i>[Signature]</i>		Part VI: To Be Completed by U.S. Customs Service 37. Signature of Importer or Agent: <i>[Signature]</i> 38. Date Signed: 6/24/74 39. Signature and Title of EPA Official: <i>[Signature]</i>	

90/09/06
03/09/06
03/09/06

SHIPPER'S DECLARATION FOR DANGEROUS GOODS 托运人危险物品申报单


Shipper 托运人 JIANGSU CHANGLONG CHEMICALS CO. LTD LONGHU TANG, NEW DISTRICT OF CHANGZHOU JIANGSU, P.R. CHINA-213031 TEL: 86 519 5480001 FAX: 86 519 5481166		Air Waybill No. 999-8013 2205 航空运单号码 Page 1 of 1 Pages 第 1 页, 共 1 页 Shipper's Reference Number (optional) 托运人编号(可选择)													
Consignee 收货人 WOODLANDS SPECIALIST, INC. HANGER 209 CRAIG FIELD, SELMA, ALBAMA 36701, USA Tel. 电话: 1-334-874-3948		 AIR CHINA 中国国际航空公司													
Two completed and signed copies of this Declaration must be handed to the operator. 两份填写并签署好的申报单要交给承运人。		WARNING 警告 Failure to comply in all respects with the applicable Dangerous Goods Regulations may be in breach of the applicable law, subject to legal penalties. This Declaration must not, in any circumstances, be completed and/or signed by a consolidator, a forwarder or an IATA cargo agent. (Shipper's Responsibilities on the reverse hereof) 未完全按照适用的《危险物品规则》办理则可能会触犯有关法律, 要受到法律制裁。本申报单在任何情况下, 都不得由货物的承运人、运输承托人或国际航空运输代理人填制和/或签署。 (托运人的责任见背面)													
TRANSPORT DETAILS 运输说明 This shipment is within the limitations prescribed for: (delete non-applicable) 此货物限定于: (不选用的删掉) <input checked="" type="checkbox"/> PASSENGER AND CARGO AIRCRAFT 客机和货机		Airport of Departure 始发站机场 BEIJING													
Airport of Destination 目的站机场 BIRMINGHAM		Shipment type: (delete non-applicable) 货物种类: (不选用的删掉) <input checked="" type="checkbox"/> NON-RADIOACTIVE 非放射性 <input checked="" type="checkbox"/> DANGEROUS 危险品													
NATURE AND QUANTITY OF DANGEROUS GOODS 危险物品的种类和数量															
Dangerous Goods Identification 危险物品识别					Quantity and type of packing 数量及包装类型		Packing Inst. 包装说明		Authorization 批准						
Proper Shipping Name 运输专用名称 ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S. (METSULFURON)		Class or Division 类或项 9		UN or ID No. UN 及 ID 编号 UN 3077		Packing Group 包装等级 III		Subsidiary Risk 次要危险性		40 FIBRE DRUMS X 25KG		911			
Additional Handling Information 附加操作说明 24H EMERGENCY TEL: 1-334-874-3948															
I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. 我在此声明, 上述危险物品名称完整、准确地表述了货物的固有属性并进行了分类、包装、标记、标签/贴签, 各方面均符合国际、国家及地区的有关规定。										Name/Title of signatory 签署者姓名/职务 ZHANGJIE/MANAGER Place and date 地点和日期 BEIJING MAY, 31, 2004 Signature 签字 1815 (See warning above) (见上述警告)					

EXHIBIT 1-
03/09/06
ZH

DEPARTMENT OF THE TREASURY
UNITED STATES CUSTOMS SERVICE

Form Approved
OMB No. 1515-0049

X

EXPECT EXUM
required
ALQm NOTE

ENTRY/IMMEDIATE DELIVERY

CA

CAROLE C. LELAND CHB
P.O. BOX 11146, BIRMINGHAM, AL 35202
CUSTOMS TEAM # -502
<ABI CERTIFIED>

PAGE 1

1. ARRIVAL DATE 60904		2. ELECTED ENTRY DATE		3. ENTRY TYPE CODE/NAME 23		4. ENTRY NUMBER AM3-0408703-5	
5. PORT 1904		6. SINGLE TRAN. BOND X 421		7. BROKER/IMPORTER FILE NUMBER 08703		8. IMPORTER NUMBER SAME	
9. CONSIGNEE NUMBER 427-19-8293		10. ULTIMATE CONSIGNEE NAME LEIGH B ALLEN 45 BERKELEY CIRCLE HANGER 209 CRAIG FIELD SEBAMA, AL 36701		11. IMPORTER OF RECORD NAME SAME		12. CARRIER CA	
13. VOYAGE/FLIGHT/TRIP 015		14. LOCATION OF GOODS - CODE(S)/NAME(S) Q987 BIRMINGHAM EXPRESS		15. VESSEL CODE/NAME AIR CHINA		16. U.S. PORT OF UNLADING 3901	
17. MANIFEST NUMBER		18. G.O. NUMBER		19. TOTAL VALUE 24500		20. DESCRIPTION OF MERCHANDISE METSULFURON METHYL P/L- BEIJING	
21. IT/BL/AWB CODE I		22. IT/BL/AWB NO. 99980132205		23. MANIFEST QUANTITY 40		24. TSUSA NUMBER 9813000540	
25. COUNTRY OF ORIGIN CN		26. MANUFACTURER ID CNJIACHAJIA		27. CERTIFICATION I hereby make application for entry/immmediate delivery. I certify that the above information is accurate; the bond is sufficient, valid and current, and that all requirements of 19 CFR Part 142 have been met.		28. CUSTOMS USE ONLY	
29. BROKER OR OTHER GOVT. AGENCY USE		30. OTHER AGENCY ACTION REQUIRED, NAMELY: EXPECT EXUM Required no exceptions		31. CUSTOMS EXAMINATION REQUIRED		32. ENTRY REJECTED, BECAUSE:	
33. DELIVERY AUTHORIZED		34. SIGNATURE [Signature]		35. DATE 25 March		36. RELEASED BY USDA/P.P.Q.	

27. CERTIFICATION
I hereby make application for entry/immmediate delivery. I certify that the above information is accurate; the bond is sufficient, valid and current, and that all requirements of 19 CFR Part 142 have been met.
SIGNATURE OF APPLICANT
X CAROLE C. LELAND CHB
PHONE NO. ATTY-IN-FACT (205) 328-2343 DATE 6/22/04

28. CUSTOMS USE ONLY
☐ OTHER AGENCY ACTION REQUIRED, NAMELY:
EXPECT EXUM Required
no exceptions
☐ CUSTOMS EXAMINATION REQUIRED
☐ ENTRY REJECTED, BECAUSE:
[Signature]
DELIVERY AUTHORIZED: [Signature] SIGNATURE: [Signature] DATE: 25 March
RELEASED BY USDA/P.P.Q.
SIGNATURE DATE

EXHIBIT B
03/07/06 75/

DEPARTMENT OF THE TREASURY
UNITED STATES CUSTOMS SERVICE

F01

NOTICE OF PENALTY OR LIQUIDATED DAMAGES INCURRED
AND DEMAND FOR PAYMENT

19 USC 1618, 19 USC 1623

Case Number

2005190420004801

Port Name and Code

1904 BIRMINGHAM, AL

Investigation File No.

TO: ☐ LEIGH B. ALLEN
45 BERKELEY CIRCLE, HANGAR 209
SELMA AL 36701

TEAM NUMBER: 502

ID: 427198293

APR 2006
RECEIVED
PESTICIDE
MANAGEMENT
OURL 1 INC.

PAGE 1 OF 1
☐ Penalties or ☒ Liquidated Damages

DEMAND IS HEREBY MADE FOR PAYMENT OF \$ 100.00, representing
assessed against you for violation or law or regulation, or breach of bond, as set forth below:

TIB NUMBER: AM304087035

TIB ENTERED: 06/25/2004 IMPORTED: 06/03/2004

EXPORT/DESTRUCTION REQUIRED BY: 06/03/2005

MERCHANDISE DESCRIPTION:

METSULFURON METHYL 60 PERCENT WDG, 1000 KGS PACKED IN 40 DRU

LIQUIDATED DAMAGES HAVE BEEN COMPUTED AT TWICE THE DUTY DUE

FAILURE TO EXPORT OR DESTROY MERCHANDISE IN ACCORDANCE WITH THE TERMS
AND CONDITIONS OF THE TEMPORARY IMPORTATION BOND.

Received 4 pallets James Shipper 8/10/05

LAW OR REGULATION VIOLATED

19CFR10.39(D)(1)

BOND BREACHED

BOND TYPE: SINGLE TRANSACTION
BOND # 08703

DESCRIPTION OF BOND
(if any)

Form Number

Amount
\$

Date

27,685

06/22/2004

Name and Address of Principal on Bond

LEIGH B. ALLEN

45 BERKELEY CIRCLE, HANGAR 209, SELMA, AL 36701

Name and Address of Surety on Bond

INTERNATIONAL FIDELITY INS CO

C/O INT'L BOND & MARINE BKGE, TWO HUDSON PLACE, 4TH FLOOR, HOBOKEN, NJ 421

Surety Identification No.

If you feel there are extenuating circumstances, you have the right to object to the above action. Your petition should explain why you should not be penalized for the cited violation. Write the petition as a letter or in legal form; submit in (duplicate) (triplicate), addressed to the Commissioner of Customs, and forward to the FP&F Officer at

U.S. CUSTOMS/FP&F, P.O. BOX 2748, MOBILE, AL 36652

Unless the amount herein demanded is paid or a petition for relief is filed with the FP&F Officer within the indicated time limit, further action will be taken in connection with your bond or the matter will be referred to the United States Attorney.

TIME LIMIT FOR PAYMENT OR
FILING PETITION FOR RELIEF
(Days from the date of this Notice)

60

Signature

ELOISE DUFF

Title

FPF OFFICER

Date

07/20/2005

By

DEPARTMENT OF THE TREASURY
UNITED STATES CUSTOMS SERVICE

NOTICE OF PENALTY OR LIQUIDATED DAMAGES INCURRED
AND DEMAND FOR PAYMENT

19 USC 1618, 19 USC 1623

F03

Case Number **03/07/66**

2005190420004801

Port Name and Code

1904 BIRMINGHAM, AL

Investigation File No.

TO: INTERNATIONAL FIDELITY INS CO
C/O INT'L BOND & MARINE BKGE
TWO HUDSON PLACE, 4TH FLOOR
HOBOKEN, NJ 07030

TEAM NUMBER: 502

ID: 427198203

DEMAND IS HEREBY MADE FOR PAYMENT OF \$ 3,135.00 representing ☐ Penalties or ☒ Liquidated Damages assessed against you for violation or law or regulation, or breach of bond, as set forth below:

PAGE 1 OF 1

TIB NUMBER: AM304087035

TIB ENTERED: 06/25/2004 IMPORTED: 06/03/2004

EXPORT/DESTRUCTION REQUIRED BY: 06/03/2005

MERCHANDISE DESCRIPTION:

METSULFURON METHYL 60 PERCENT WDG, 1000 KGS PACKED IN 40 DRU
LIQUIDATED DAMAGES HAVE BEEN COMPUTED AT TWICE THE DUTY DUE
FAILURE TO EXPORT OR DESTROY MERCHANDISE IN ACCORDANCE WITH THE TERMS
AND CONDITIONS OF THE TEMPORARY IMPORTATION BOND.

IN ACCORDANCE WITH PART 172 OF THE CUSTOMS REGULATIONS, YOU MAY:
NO RELIEF GRANTED PRINCIPAL.

APR 2006
RECEIVED
PESTICIDE
MANAGEMENT
ACRL & INTL

LAW OR REGULATION VIOLATED

19CFR10.39(D)(1)

BOND BREACHED

BOND TYPE: SINGLE TRANSACTION
BOND # 08703

DESCRIPTION OF BOND
(if any)

Form Number

Amount
\$

Date

27,685 06/22/2004

Name and Address of Principal on Bond

LEIGH B. ALLEN

45 BERKELEY CIRCLE, HANGAR 209, SELMA, AL 36701

Name and Address of Surety on Bond

INTERNATIONAL FIDELITY INS CO

Surety Identification No.

C/O INT'L BOND & MARINE BKGE, TWO HUDSON PLACE, 4TH FLOOR, HOBOKEN, NJ 07030

If you feel there are extenuating circumstances, you have the right to object to the above action. Your petition should explain why you should not be penalized for the cited violation. Write the petition as a letter or in legal form; submit in (duplicate) (triplicate), addressed to the Commissioner of Customs, and forward to the FP&F Officer at

CBP/FP&F OFFICE, PO BOX 2748, MOBILE, AL 36652

Unless the amount herein demanded is paid or a petition for relief is filed with the FP&F Officer within the indicated time limit, further action will be taken in connection with your bond or the matter will be referred to the United States Attorney.

TIME LIMIT FOR PAYMENT OR
FILING PETITION FOR RELIEF
(Days from the date of this Notice)

60

By *Elaine Buff*
ELAISE BUFF

Title

FP&F OFFICER 251-441-5102

Date

09/26/2005

Customs Form 5955A (08/00)

**NEKO TECH CENTER: HEALTH & TECHNOLOGY PROGRAMS**

NEKO Tech 2005: Save a Million Lives through Health and Technology Programs



EXHIBIT I

03/09/06

JH.

September 16, 2005

Mr. Leigh B. Allen
45 Berkeley Circle
Selma, Alabama

SATISFIED FPAS (?)

Dear Mr. Leigh Allen:

We are pleased to receive your shipment of Metsulfuron Methyl herbicide. I understand that this herbicide is NOT registered for use in the United States.

We look forward to a successful completion of our projects this year.

Yours sincerely,


Ofei Okraku
Program Manager

APR 2006
RECEIVED
PESTICIDE
MANAGEMENT
AGRI. & IND.

WAX

EXHIBIT J
03/14/06
SD.

June 21, 2004

Mr. Lee Furse, EPA Pesticide
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303-3104
Telephone (404)562-8968
FAX (404) 562-8973

Dear Mr. Furse:

We are currently in the process of importing two products from China for repackaging and export to a client in Brazil. These products will not be entering the commerce of the United States, but will be repackaged at our EPA-approved establishment (81198-AL-001).

Currently a portion of the product is with U.S. Customs in Birmingham, AL (1000 kgs Metsulfuron Methyl 60%). We expect that the balance of the product (2500 kgs 2,3-Pyridinedicarboxylic Acid 60%) will arrive shortly.

In order to gain entrance, we are requesting a T&E from our freight forwarder, Cooper T. Smith in Mobile, AL. Cooper T. Smith will be handling the movement of the product from Mobile to Vitoria, Brazil.

Currently Ms. Carole C. Leland CustomHouse Brokers in Birmingham (12698) is handling this transaction for us. Ms. Leland can be reached at 205-328-2343. Other than this T&E document, if there anything else that is necessary for us to provide to you, we will be happy to do so.

Sincerely,

KIA

Leigh B. Allen
Woodlands Specialists, Inc
334-872-6001

APR 2006
RECEIVED
PESTICIDE
MANAGEMENT
AGRI. & IND.

6/21/2004

DEPARTMENT OF THE TREASURY
UNITED STATES CUSTOMS SERVICE

F01

NOTICE OF PENALTY OR LIQUIDATED DAMAGES INCURRED
AND DEMAND FOR PAYMENT

19 USC 1618, 19 USC 1623

Case Number

2005190420004801

Port Name and Code

1904 BIRMINGHAM, AL

Investigation File No.

TO: ☐ LEIGH B. ALLEN
45 BERKELEY CIRCLE, HANGAR 209
SELMA AL 36701

TEAM NUMBER: 502

ID: 427198293

PAGE 1 OF 1

DEMAND IS HEREBY MADE FOR PAYMENT OF \$ 100.00, representing ☐ Penalties or ☒ Liquidated Damages
assessed against you for violation or law or regulation, or breach of bond, as set forth below:

TIB NUMBER: AM304087035

TIB ENTERED: 06/25/2004 IMPORTED: 06/03/2004

EXPORT/DESTRUCTION REQUIRED BY: 06/03/2005

MERCHANDISE DESCRIPTION:

METSULFURON METHYL 60 PERCENT WDG, 1000 KGS PACKED IN 40 DRU
LIQUIDATED DAMAGES HAVE BEEN COMPUTED AT TWICE THE DUTY DUE
FAILURE TO EXPORT OR DESTROY MERCHANDISE IN ACCORDANCE WITH THE TERMS
AND CONDITIONS OF THE TEMPORARY IMPORTATION BOND.

RECEIVED
PESTICIDE
MANAGEMENT
AGRI. & IND.

*Received Fertilizer Boxes & Liquid from Mon, Jan 9/06
J. Allen Shipper*

Received 4 pallets J. Allen Shipper 8/10/05

LAW OR REGULATION VIOLATED

19CFR10.39(D)(1)

BOND BREACHED

BOND TYPE: SINGLE TRANSACTION
BOND # 08703

DESCRIPTION OF BOND
(if any)

Form Number

Amount
\$

27,685

Date

06/22/2004

Name and Address of Principal on Bond

LEIGH B. ALLEN

45 BERKELEY CIRCLE, HANGAR 209, SELMA, AL 36701

Name and Address of Surety on Bond

INTERNATIONAL FIDELITY INS CO

Surety Identification No.

C/O INT'L BOND & MARINE BKGE, TWO HUDSON PLACE, 4TH FLOOR, HOBOKEN, NJ 421

If you feel there are extenuating circumstances, you have the right to object to the above action. Your petition should explain why you should not be penalized for the cited violation. Write the petition as a letter or in legal form; submit in (duplicate) (triplicate), addressed to the Commissioner of Customs, and forward to the FP&F Officer at

U.S. CUSTOMS/FP&F, P.O. BOX 2748, MOBILE, AL 36652

Unless the amount herein demanded is paid or a petition for relief is filed with the FP&F Officer within the indicated time limit, further action will be taken in connection with your bond or the matter will be referred to the United States Attorney.

TIME LIMIT FOR PAYMENT OR
FILING PETITION FOR RELIEF
(Days from the date of this Notice)

60

Signature

ELOISE DUFF

Title

FPF OFFICER

Date

07/20/2005

By

2 04 11:24a

Woodlands Specialists

1-334-874-3948

P.4

JIANGSU CHANGLONG CHEMICALS CO., LTD.

ADD: LONOHU TANG, NEW DISTRICT OF CHANGZHOU, JIANGSU, P.R. CHINA
 FAX: 86 519 5481146 TEL: 86 519 5480801 P.C. 312051 E-mail: cangjlg@public.sx.cn

COMMERCIAL INVOICE**Shipper/Exporter**

JIANGSU CHANGLONG CHEMICALS CO. LTD
 LONOHU TANG, NEW DISTRICT OF CHANGZHOU,
 JIANGSU, P.R. CHINA-213031

No. & date of Commercial Invoice

JCC-04059C-1 DATED MAY 26, 2004

No. & date of Sales Confirmation

JCC-04059 DATED APR. 30, 2004

No. & date of LC**Buyer**

WOODLANDS SPECIALIST, INC.
 HANGAR 209 CRAIG FIELD, SELMA, ALABAMA 36701, USA

LC issuing bank**Terms of Payment**

35% BY T/T IN ADVANCE
 35% BY T/T AGAINST COPY OF THE SHIPPING
 DOCUMENTS
 30% BY T/T AT 45 DAYS FROM AWB DATE

Remarks:

Port of loading
 BEIJING

Destination
 BIRMINGHAM, ALABAMA, USA

Flight No.
 CA

Selling on or about:
 MAY 31, 2004

Marks and numbers; Description of goods; Number and Kind of Package
 NM METSULFURON METHYL 60% WDG

Quantity

1000KG

Unit price

@USD24.50/KG
 CIF
 BIRMINGHAM,
 ALABAMA,
 USA

Amount


USD24500.00

#2934.99.1500
 mid # Cnliachasia

PACKING IN 25KG FIBER DRUM

TOTAL FORTY DRUMS

TOTAL AMOUNT: US DOLLARS TWENTY FOUR THOUSAND FIVE HUNDRED ONLY

Signature: 
 JIANGSU CHANGLONG CHEMICALS CO., LTD.



U.S. DEPARTMENT OF HOMELAND SECURITY
Bureau of Customs and Border Protection

OMB No 1651-0050

CUSTOMS BOND

10 CFR Part 113

CBP
USE
ONLY

BOND NUMBER 1 (Assigned by CBF)

FILE REFERENCE
08703

Execution Date	
----------------	--

06/22/2004

In order to secure payment of any duty, tax or charge and compliance with law or regulation as a result of activity covered by any condition referenced below, we, the below named principal(s) and surety(ies), bind ourselves to the United States in the amount or amounts, as set forth below.

SECTION I--Select Single Transaction OR Continuous Bond (not both) and fill in the applicable blank spaces

☒ SINGLE TRANSACTION BOND

Identification of transaction secured by this bond (e.g., entry no., seizure no., etc.)

AM3-0408703-5

Date of transaction	06/22/2004
---------------------	------------

Pon code	1904
----------	------

☐ CONTINUOUS BOND

Effective date

This bond remains in force for one year beginning with the effective date and for each succeeding annual period, or until terminated. This bond constitutes a separate bond for each period in the amounts listed below for liabilities that accrue in each period. The intention to terminate this bond must be conveyed within the period and manner prescribed in the Customs Regulations.

SECTION II-- This bond includes the following agreements. 2 (Check one box only, except that, 1a may be checked independently of with 1, and 3a may be checked independently of with 3. Line out all other parts of this section that are not used.

Activity Code	Activity Name and Customs Regulations in which conditions codified	Limit of Liability	Activity Code	Activity Name and Customs Regulations in which conditions codified	Limit of Liability
<input checked="" type="checkbox"/> 1	Importer or broker..... 113.62	27,685.00	<input type="checkbox"/> 5	Public Storage..... 113.62	
<input type="checkbox"/> 1a	Guarantee, Reimbursement, Refunds..... 113.65		<input type="checkbox"/> 6	Wool & Fur Products Labeling Act Importation (Single Entry Only)..... 113.68	
<input type="checkbox"/> 2	Custodian of bonded merchandise..... 113.63 (includes bonded warehouse, freight forwarders, carrier and lighters, air carrier or warehouse, container station operators).....		<input type="checkbox"/> 7	Bul of Lading (Single Entry Only)..... 113.69	
<input type="checkbox"/> 3	International Carrier..... 113.64		<input type="checkbox"/> 8	Destruction of Copyrighted Material (Single Entry Only)..... 113.70	
<input type="checkbox"/> 3a	Instrument of International Traffic..... 113.66		<input type="checkbox"/> 9	Neutrality (Single Entry Only)..... 113.71	
<input type="checkbox"/> 4	Foreign Trade Zone Operation..... 113.67		<input type="checkbox"/> 10	Excess Costs for Condemned Goods (Single Entry Only)..... 113.72	

SECTION III-- List below all tradenames or unincorporated divisions that will be permitted to obligate this bond in the principal's name including their CBP Identification Number(s). (If more space is needed, use Section III (Continuation) on back of form.)

Imported Number	Importer Name

SECTION III (If more space is needed, use Section III (Continuation) on back of form.)		Importer Number	Importer Name
Importer Number	Importer Name		
		Total number of importer names listed in Section III.	

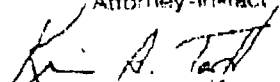


Principal and surety agree that any charge against the bond under any of the listed names is as though it was made by the principal(s).

Principal and surety agree that they are bound to the same extent as if they executed a separate bond covering each set of conditions incorporated by reference to the Customs Regulations into this bond.

If the surety fails to appoint an agent under Title 6, United States Code, Section 7, surety consents to service on the Clerk of any United States District Court or the U.S. Court of International Trade, where suit is brought on this bond. That clerk is to send notice of the service to the surety at:

Mailing Address Requested by the Surety

International Fidelity Insurance Company
Care of International Bond & Marine
2 Hudson Place - 4th Floor
Hoboken, NJ 07030

PRINCIPAL	Name and Address LEIGH B ALLEN DBA: WOODLANDS SPECIALISTS 45 BERKELEY CIRCLE HANGER 209 SELMA AL 36701		Importer No. 3 427-19-8293	SEAL
	Incorporated In: Name and Address		SIGNATURE 5 Atty.-In-Fact: CARLETON S. ALLEN	
PRINCIPAL	Name and Address		Importer No. 3	SEAL
			SIGNATURE 6	
SURETY	Name and Address 8 International Fidelity Insurance Company One Newark Center Newark, N.J. 07102-5207 (A New Jersey Corporation)		Surety No. 7 421	Attorney-in-fact  Kevin A. Taftam Power of Attorney limited to \$2,000,000
			SIGNATURE 5	
SURETY	Name and Address 8		Surety No. 7	
			SIGNATURE 5 	
SURETY AGENTS	Name 8 Kevin A. Taftam	Identification No. 9 143-48-7151	Name 9	Identification No. 9

CBP Form 304 (05/98)

CAP Form 301 (05/98)

PART 3 - PRINCIPAL

L-3

DEPARTMENT OF THE TREASURY
UNITED STATES CUSTOMS SERVICE

ENTRY SUMMARY

CAROLE C. LELAND CHB
P.O. BOX 11146, BIRMINGHAM, AL
04059C

AM3

1. Entry No. 0408703-5	2. Entry Type Code 23 ABI/S	3. Entry Summary Date 502
4. Entry Date 6/09/04	5. Port Code 1904	
6. Bond No. 421	7. Bond Type Code 9	8. Broker/Importer File No. 08703
9. Consignee No. 427-19-8293	10. Importer No. 427-19-8293	
11. Importer of Record Name and Address LEIGH B ALLEN 45 BERKELEY CIRCLE HANGER 209 CRAIG FIELD SELMA, AL 36701		
13. Exporting Country CN		14. Export Date 5/31/04
15. Country of Origin CN		16. Missing Documents
17. I.T. No. 99980132205		18. I.T. Date 6/03/04

9. Ultimate Consignee Name and Address

SAME

AL
State

19. HTS or AHTS No. 99980132205	20. Mode of Transportation 40	21. Manufacturer ID CNJIACHAJIA
22. Transporting Carrier AIR CHINA	24. Foreign Port of Loading	25. Location of Goods (G.O.) No. Q987 BIRMINGHAM EXPRESS
26. U.S. Port of Loading 3901	23. Import Date 6/03/04	

28. Line No.	29. Description of Merchandise		32. Net Quantity in U.S. Units	33. A. Entered Value B. CBUS C. Revaluation	34. A. T.S.I. S.A. Rate B. ADA/CVO Rate C. I.R.C. Rate D. Visa No.	35. Duty and I.R. Tax	
	30. A. T.S.I. S.A. No. B. ADA/CVO Case No.	31. A. Gross Weight B. Manifest Qty.				Dollars	Cents
001	40 PKGS.	40 TOTAL PKGS. INVOICE 1 - 4059C		N			
	OTHER ARTCLS	T.B. REPAIRD AL		24500			
	9813.00.0540	1115		63795			
	HETEROCYCLIC: OTHER HERBICI		1 KG				
	2934.99.1500						
	I.V.	24500.00 USD					
	E.V.	24500					
	40 TOT. PKGS.						
	IMPORTED FOR A PERIOD NOT TO EXCEED ONE YEAR NOT TO BE PUT TO ANY OTHER USE AND NOT IMPORTED FOR SALE OR SALE ON APPROVAL.						
	TOTAL DUTY 1 592.50						
	BOND CHARGE 3 185.00						
(De Minimis)				24500			
TOTAL ENTERED VALUE							

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MANAGEMENT
AGRI. & IND.

36. Declaration of Importer of Record (Owner or Purchaser) or Authorized Agent

I declare that I am the importer of record and that the actual owner, purchaser, or consignee for customs purposes is as shown above.

I further declare that the merchandise was obtained pursuant to a purchase or agreement to purchase and that the prices set forth in the invoice are true.

☒ owner or purchaser or agent thereof.

☐ was not obtained pursuant to a purchase or agreement to purchase and the statements in the invoice as to value or price are true to the best of my knowledge and belief.

I also declare that the statements in the documents herein filed fully disclose to the best of my knowledge and belief the true prices, value, quantities, rebates, drawbacks, fees, commissions, and royalties and are true and correct, and that all goods or services provided to the seller of the merchandise enter free of or at reduced rates are fully disclosed. I will immediately furnish to the appropriate customs offices any information showing a different state of facts.

Notice required by Paperwork Reduction Act of 1980. This information is needed to ensure that importers are complying with U.S. Customs laws, to allow us to compute and collect the right amount of money, to enforce other agency requirements, and to collect accurate statistical information on imports. Your response is mandatory.

37. Signature of Declarant, Title and Date

CAROLE C. LELAND CHB
C. LELAND ATTY-IN-FACT 6/22/04

Customs Form 7501 Part 2 (11/00/04)

PAGE- 1

DUTY DUE- 0/00/00

11:06:49

L-4

TO: International Trade Community
FROM: Port Director
SUBJECT: Wood Packing Material

MANAGEMENT
& IND.

USDA has revised its import regulation for wood packaging material (WPM). The revised WPM regulation is effective as of September 16, 2005. The regulation requires WPM coming into the U.S. to be treated and marked. The approved treatments are either heat treatment to a minimum wood core temperature of 56°C for a minimum of 30 minutes or fumigation with methyl bromide (MB). An acceptable mark is:



XX - 000
YY

XX represents the ISO country code.
000 represents the unique number assigned by the national plant protection organization.
YY represents either HT for heat treatment or MB for methyl bromide fumigation.

In cases of noncompliance, an examining officer at the port of first arrival may order the immediate re-export of regulated wood packaging material along with the accompanying cargo. In other words, if your WPM is not treated and marked, your cargo may also be subject to immediate export. Please ensure your company's compliance.

✓ **Effective September 16, 2005, paper certificates of treatment will no longer be required or acceptable.**

There are certain exemptions from the new requirements. More information is available from USDA or at <http://www.aphis.usda.gov/ppq/swr/import.html>

WJL

1111111111

L-5

SHIPPER'S DECLARATION FOR DANGEROUS GOODS

(Provide at least two copies to the airline.)

Shipper

LEIGH ALLEN
45 BERKELEY CIRCLE
SELMA, AL 36701
334-875-0798

Air Waybill No. 999-8013 2205

Page 1 of 1 Pages

Shipper's Reference Number
(optional)

Consignee NEKOTECH CENTER TEMA BRANCH
A/31 PAA GRANT CLOSE, PO BOX 77
OPPOSITE COURTESY INTERNATIONAL HOTEL
COMMUNITY 10 TEMA GHANA WEST AFRICA
233-2230-6363 (P) ATT: PRINCESS ASIE OCANSEY

Two completed and signed copies of this Declaration must
be handed to the operator

WARNING

Failure to comply in all respects with the applicable
Dangerous Goods Regulations may be in breach of
the applicable law, subject to legal penalties. This
Declaration must not, in any circumstances, be
completed and/or signed by a consolidator, a
forwarder or an IATA cargo agent.

TRANSPORT DETAILS

This shipment is within the
limitations prescribed for:
(delete non-applicable)

☒ PASSENGER ☒ CARGO
☒ AIR CARRIER ☒ AIR CARRIER
☒ AIR CARRIER ☒ AIR CARRIER

Airport of Departure

VIA OCEAN
FREIGHT

Airport of Destination: TEMA, GHANA

Shipment type: (delete non-applicable)

☒ NON-RADIOACTIVE ☒ RADIOACTIVE

NATURE AND QUANTITY OF DANGEROUS GOODS (See Sub-Section 8.1 of IATA Dangerous Goods Regulations)

Dangerous Goods Identification				Quantity and type of packing	Packing Int.	Authorization
Proper Shipping Name	Class or Division	UN or ID No.	Subsidiary Risk			
ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S. (METSULFURON)	9	UN 3077		137 CARDBOARD BOXES X8: KG		

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MANAGEMENT
AGRIC. & IND.

Additional Handling Information

24 hr. Emergency Contact Tel. No. 601-927-6692

I hereby declare that the contents of this consignment are fully and
accurately described above by proper shipping name and are classified,
packed, marked and labelled, and are in all respects in the proper
condition for transport by air according to the applicable International and
National Government Regulations.

Name/Title of Signatory LEIGH ALL

Place and Date SELMA, AL
OCT. 13, 2005

Signature
(see warning above)

Leigh Allen

L-6

FAX:
(205) 324-4253

JENSEN SHIPPING COMPANY, INC.

INTERNATIONAL/DOMESTIC FREIGHT FORWARDERS
AIR FREIGHT AND OCEAN FREIGHT

e-mail address: kajjensen@mindspring.com

TELEPHONE:
(205) 328-2343

OTI LICENSE
8291NF

SEAGATE STEAMSHIP LINES, INC.

October 12, 1005

Mr Lee B. Allen
Woodlands Specialists
Selma

APR 2006
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PESTICIDE
MANAGEMENT
AGRI. & IND.

Hello Lee:

We can have a 20-ft container positioned at James Alexander's place (Shippers Express) and he will probably be glad to load it for you.

The freight from Shippers Express' door to TEMA, Ghana will be \$5,320.00. This includes all the fuel and bunker surcharges from door to port. Freight cannot go collect.

We will need a purchase order from you on this, please.

Also, Carole will coordinate everything with US Customs so you do not get into trouble.

Call me when you think you will have delivered the additional material to James'.

Kindest Regards

Kaj

COPY TO SHIPPERS
COPY TO CAROLE LELAND

"Over Thirty Years Expertise In Ocean And Air Traffic"

244 WEST VALLEY AVENUE • BIRMINGHAM, ALABAMA 35209

L-1

Wendy

From: Wendy [wendys@woodlandsspecialists.com]
Sent: Thursday, December 08, 2005 3:58 PM
To: 'lelandchb@earthlink.net'
Subject: un 4g cartons

I have located a company in B'ham called inmark. They are going to supply me with the cartons & stickers. I will take a crew with me to Shippers Express and repack the material and label the cartons. What should I do next to move this material from his warehouse and ship to Ghana asap.

Wendy Smith

Hangar 209 Craig Field
Selma, Alabama 36701
334.872.6001 (p)
888.212.6365 toll free
334.874.3948 (f)

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AGRI. & IND.

W

1/3/2006

L-8

FAX:
(205) 324-4253

JENSEN SHIPPING COMPANY, INC.

INTERNATIONAL/DOMESTIC FREIGHT FORWARDERS
AIR FREIGHT AND OCEAN FREIGHT

e-mail address: kajjensen@mindspring.com

TELEPHONE:
(205) 328-2343
OTI LICENSE
8291NF

SEAGATE STEAMSHIP LINES, INC.

January 30, 2006

Leigh Allen
Woodlands
Selma

APR 2006
RECTIFIED
PESTICIDE
MANAGEMENT
AGRI. & IND.

I have been to look at the goods you have sent to Shippers Express.

We are trying to get a carrier to accept a 40-ft container to Tema, Ghana.

In the meantime, please provide us with the hazardous documentation of which I enclose a blank form.

Nothing can be done until this form has been accomplished.

Kaj V. Jensen

Enclosure

2.6.06
Kaj,
Do you have the
air waybill no. for this
shipment? I need it to
complete form.
Wang

"Over Thirty Years Expertise In Ocean And Air Traffic"

244 WEST VALLEY AVENUE • BIRMINGHAM, ALABAMA 35209

L-9

JUN 02 04 11:23a

Woodlands Specialists

1-334-874-3948

P.1



Hangar 209 Craig Field Selma, Alabama 36701
Phone: (334) 872-6001 Fax: (334) 874-3948

Hangar 209 Craig Field,
Phone: 334-872-6001

Selma, AL 36701
Fax: 334-874-3948

FAX COVER SHEET

TO: Carole Leland
COMPANY: Custom House Brokers
FAX NO: 205-324-4253
FROM: Leigh Allen DATE: 6-2-04
FAX NO: _____

Pages (including cover sheet) 9

Message:

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MANAGEMENT
COUNCIL & INC.

int

HP Fax Series 900
Plain Paper Fax/Copier

Fax History Report for
Woodlands Specialists
1-334-874-3948
Sep 16 2005 9:37am

L-10

Last Fax

<u>Date</u>	<u>Time</u>	<u>Type</u>	<u>Identification</u>	<u>Duration</u>	<u>Pages</u>	<u>Result</u>
Sep 16	9:35am	Received	233 22 305641	0:48	1	OK

Result:

OK - black and white fax

APR 2006
RECEIVED
PESTICIDE
MANAGEMENT
ACRL & INC.

GM

(205) 324-4253

JENSEN

SHIPPING COMPANY, INC.

INTERNATIONAL/DOMESTIC FREIGHT FORWARDERS
AIR FREIGHT AND OCEAN FREIGHT

e-mail address: kajjensen@mindspring.com

SEAGATE STEAMSHIP LINES, INC.

TELEPHONE:
(205) 328-2343

OTI LICENSE
8291NF

January 30, 2006

Leigh Allen
Woodlands
Selma

KJA

I have been to look at the goods you have sent to Shippers Express.

We are trying to get a carrier to accept a 40-ft container to Tema, Ghana.

In the meantime, please provide us with the hazardous documentation of which I enclose a blank form.

Nothing can be done until this form has been accomplished.

Kaj V. Jensen

Enclosure

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MANAGEMENT
AGRI. & IND.

"Over Thirty Years Expertise In Ocean And Air Traffic"

244 WEST VALLEY AVENUE • BIRMINGHAM, ALABAMA 35209

SHIPPER'S DECLARATION FOR DANGEROUS GOODS

(Provide at least two copies to the airline.)

M-3

Shipper

Air Waybill No.

Page of Pages

Shipper's Reference Number
(optional)

Consignee

Two completed and signed copies of this Declaration must
be handed to the operator

TRANSPORT DETAILS

This shipment is within the
limitations prescribed for:
(delete non-applicable)

Airport of Departure

PASSENGER
AND CARGO
AIRCRAFTCARGO
AIRCRAFT
ONLY

Airport of Destination:

WARNING

Failure to comply in all respects with the applicable
Dangerous Goods Regulations may be in breach of
the applicable law, subject to legal penalties. This
Declaration must not, in any circumstances, be
completed and/or signed by a consolidator, a
forwarder or an IATA cargo agent.

Shipment type: (delete non-applicable)

NON-RADIOACTIVE RADIOACTIVE

NATURE AND QUANTITY OF DANGEROUS GOODS (See Sub-Section 8.1 of IATA Dangerous Goods Regulations)

Dangerous Goods Identification

Proper Shipping Name

Class or Division

UN or
ID No.Subsidiary
Risk

Quantity and type of packing

Packing
Inst.

Authorization

WVA

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PESTICIDE
MANAGEMENT
AGRI. & IND.

Additional Handling Information

I hereby declare that the contents of this consignment are fully and
accurately described above by proper shipping name and are classified,
packed, marked and labelled, and are in all respects in the proper
condition for transport by air according to the applicable International and
National Government Regulations.

Name/Title of Signatory

Place and Date

Signature
(see warning above)



STATE OF ALABAMA
DEPARTMENT OF AGRICULTURE
AND INDUSTRIES

BEARD BUILDING
P.O. BOX 3336
MONTGOMERY, ALABAMA 36109-0336



NOTICE OF INSPECTION

Date of Inspection: MARCH 7, 2006	Hour: 10:30 (AM) PM
Name of Individual JAMES ALEXANDER	Title TERMINAL MANAGER
(Firm, Farmer, Homeowner, etc.) SHIPPERS EXPRESS (205) 849-0093	Address 2244 2450 PINSON VALLEY PARKWAY BIRMINGHAM, ALABAMA 35217
CASE #	

APR 2006
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PESTICIDE
MANAGEMENT
AGRI. & IND.

Reason for Inspection:

1. XX Compliance with Chapter 27 & 28, Title 2, **Code of Alabama (1975)** and Chapter 80-1-13, 80-10-9, **Alabama Administrative Code**.
2. For the purpose of inspecting sites where pesticides are being used or have been used to collect data on the use of pesticides and to determine whether pesticides are or have been used consistent with their labeling.
3. XX For the purpose of inspecting and obtaining samples of any pesticides or devices packaged, labeled, and released for shipment, and samples of any containers or labeling for such pesticides or devices in places where pesticides or devices are held for distribution or sales. FIFRA Sec. 9(a) and 12(a)(2)(B)).
4. XX For the purpose of inspecting and obtaining copies of those records specified in **FIFRA** Section 8 and 40 CFR Part 169 (Sec. 8 & 12(a)(2)(B)).
5. XX To inspect and obtain copies of records regarding sale, distribution, or disposal of pesticides and/or containers including labels, labeling and literature.
6. XX Violation suspected: IMPORTATION AND DISTRIBUTION OF UNREGISTERED

PESTICIDE PRODUCT(S) _____



Signature of Inspector

ACPS

Title

#0101

Authority for conducting inspection contained in Title 2, Code of Alabama (1975 and/or regulations promulgated thereunder.



STATE OF ALABAMA
DEPARTMENT OF AGRICULTURE
AND INDUSTRIES

BEARD BUILDING
P.O. BOX 3336
MONTGOMERY, ALABAMA 36109-0336



NOTICE OF INSPECTION

Date of Inspection: 03/08/06	Hour: <input checked="" type="radio"/> AM <input type="radio"/> PM
Name of Individual LEIGH B. ALLEN	Title PRESIDENT
(Firm, Farmer, Homeowner, etc.) WOODLAND SPECIALIST, INC (334) 872-6001 CASE # 06022	Address HANGAR 209, CRAIG FIELD SELMA, ALABAMA 36701

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PES/CLC
MANAGEMENT
AGRI & IND

Reason for Inspection:

1. ☒ Compliance with Chapter 27 & 28, Title 2, **Code of Alabama (1975)** and Chapter 80-1-13, 80-10-9, **Alabama Administrative Code**.
2. ☐ For the purpose of inspecting sites where pesticides are being used or have been used to collect data on the use of pesticides and to determine whether pesticides are or have been used consistent with their labeling.
3. ☒ For the purpose of inspecting and obtaining samples of any pesticides or devices packaged, labeled, and released for shipment, and samples of any containers or labeling for such pesticides or devices in places where pesticides or devices are held for distribution or sales. FIFRA Sec. 9(a) and 12(a)(2)(B)).
4. ☒ For the purpose of inspecting and obtaining copies of those records specified in **FIFRA** Section 8 and 40 CFR Part 169 (Sec. 8 & 12(a)(2)(B)).
5. ☐ To inspect and obtain copies of records regarding sale, distribution, or disposal of pesticides and/or containers including labels, labeling and literature.
6. ☒ Violation suspected: REPACKAGING AND DISTRIBUTION (FOR EXPORT) OF AN
UNREGISTERED PESTICIDE PRODUCT

Signature of Inspector

ACPS

#0101

Title

Authority for conducting inspection contained in Title 2, Code of Alabama (1975 and/or regulations promulgated thereunder.



STATE OF ALABAMA
DEPARTMENT OF AGRICULTURE
AND INDUSTRIES

BEARD BUILDING
P.O. BOX 3336
MONTGOMERY, ALABAMA 36109-0336



NOTICE OF INSPECTION

Date of Inspection: 03/09/06	Hour: 10:30 (AM) PM
Name of Individual LEIGH B. ALLEN	Title PRESIDENT
(Firm, Farmer, Homeowner, etc.) WOODLAND SPECIALIST, INC (334) 872-6001 CASE # 06022	Address HANGAR 209, CRAIG FIELD SELMA, ALABAMA 36701

APR 2006
RECEIVED
PESTICIDE
MANAGEMENT
AGRI. & IND.

Reason for Inspection:

1. X Compliance with Chapter 27 & 28, Title 2, **Code of Alabama (1975)** and Chapter 80-1-13, 80-10-9, **Alabama Administrative Code**.
2. For the purpose of inspecting sites where pesticides are being used or have been used to collect data on the use of pesticides and to determine whether pesticides are or have been used consistent with their labeling.
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4. X For the purpose of inspecting and obtaining copies of those records specified in **FIFRA** Section 8 and 40 CFR Part 169 (Sec. 8 & 12(a)(2)(B)).
5. To inspect and obtain copies of records regarding sale, distribution, or disposal of pesticides and/or containers including labels, labeling and literature.
6. X Violation suspected: REPACKAGING AND DISTRIBUTION (FOR EXPORT) OF AN

UNREGISTERED PESTICIDE PRODUCT


Signature of Inspector

ACPS
Title

#0101

Authority for conducting inspection contained in Title 2, Code of Alabama (1975 and/or regulations promulgated thereunder.



STATE OF ALABAMA
DEPARTMENT OF AGRICULTURE
AND INDUSTRIES

BEARD BUILDING
P.O. BOX 3336
MONTGOMERY, ALABAMA 36109-0336



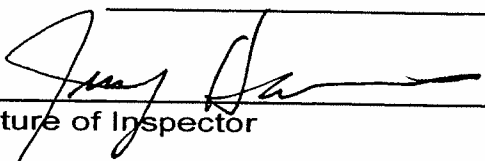
NOTICE OF INSPECTION

Date of Inspection: 03/14/06	Hour: 2:00 AM <input checked="" type="radio"/> PM
Name of Individual CAROLE C. LELAND	Title CUSTOMHOUSE BROKER
(Firm, Farmer, Homeowner, etc.) (205) 328-2343 CASE # 06022	Address 244 WEST V ALLEY AVENUE, SUITE. 205 P.O. BOX 11146 BIRMINGHAM, ALABAMA 35202

APR 2006
RECEIVED
PESTICIDE
MANAGEMENT
AGRI. & IND.

Reason for Inspection:

1. ☒ Compliance with Chapter 27 & 28, Title 2, **Code of Alabama (1975)** and Chapter 80-1-13, 80-10-9, **Alabama Administrative Code**.
2. ☐ For the purpose of inspecting sites where pesticides are being used or have been used to collect data on the use of pesticides and to determine whether pesticides are or have been used consistent with their labeling.
3. ☒ For the purpose of inspecting and obtaining samples of any pesticides or devices packaged, labeled, and released for shipment, and samples of any containers or labeling for such pesticides or devices in places where pesticides or devices are held for distribution or sales. FIFRA Sec. 9(a) and 12(a)(2)(B)).
4. ☒ For the purpose of inspecting and obtaining copies of those records specified in **FIFRA** Section 8 and 40 CFR Part 169 (Sec. 8 & 12(a)(2)(B)).
5. ☐ To inspect and obtain copies of records regarding sale, distribution, or disposal of pesticides and/or containers including labels, labeling and literature.
6. ☐ Violation suspected: _____



Signature of Inspector

ACPS
Title

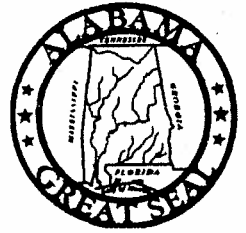
0101

Authority for conducting inspection contained in Title 2, Code of Alabama (1975 and/or regulations promulgated thereunder.



STATE OF ALABAMA
DEPARTMENT OF AGRICULTURE
AND INDUSTRIES

BEARD BUILDING
P.O. BOX 3336
MONTGOMERY, ALABAMA 36109-0336



NOTICE OF INSPECTION

Date of Inspection: 03/14/06	Hour: 2:00 AM PM
Name of Individual KAT V. JENSEN	Title PRESIDENT
(Firm, Farmer, Homeowner, etc.) JENSEN SHIPPING COMPANY, INC. (205) 324-4253 CASE # 06022	Address 244 WEST V ALLEY AVENUE, SUITE. 205 P.O. BOX 11146 BIRMINGHAM, ALABAMA 35202

APR 2006
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PESTICIDE
MANAGEMENT
AGRI. & IND.

Reason for Inspection:

1. XX Compliance with Chapter 27 & 28, Title 2, **Code of Alabama (1975)** and Chapter 80-1-13, 80-10-9, **Alabama Administrative Code**.
2. _____ For the purpose of inspecting sites where pesticides are being used or have been used to collect data on the use of pesticides and to determine whether pesticides are or have been used consistent with their labeling.
3. _____ For the purpose of inspecting and obtaining samples of any pesticides or devices packaged, labeled, and released for shipment, and samples of any containers or labeling for such pesticides or devices in places where pesticides or devices are held for distribution or sales. FIFRA Sec. 9(a) and 12(a)(2)(B)).
4. XX For the purpose of inspecting and obtaining copies of those records specified in **FIFRA** Section 8 and 40 CFR Part 169 (Sec. 8 & 12(a)(2)(B)).
5. _____ To inspect and obtain copies of records regarding sale, distribution, or disposal of pesticides and/or containers including labels, labeling and literature.
6. XX Violation suspected: IMPORT AND EXPORT OF UNREGISTERED PESTICIDE

PRODUCTS BY LEIGH ALLEN, d.b.a., WOODLAND SPECIALISTS, LLC. - SELMA, ALABAMA.


Signature of Inspector

ACPS
Title

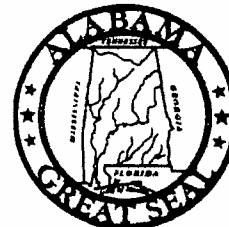
0101

Authority for conducting inspection contained in Title 2, Code of Alabama (1975 and/or regulations promulgated thereunder.



STATE OF ALABAMA
DEPARTMENT OF AGRICULTURE
AND INDUSTRIES

BEARD BUILDING
P.O. BOX 3336
MONTGOMERY, ALABAMA 36109-0336



NOTICE OF INSPECTION

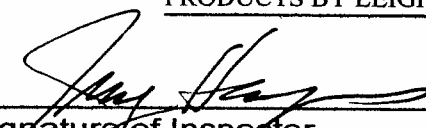
Date of Inspection: 03/16/06	Hour: 10:00 <input checked="" type="radio"/> AM <input type="radio"/> PM
Name of Individual ANGUS R. COOPER, II	Title CHAIRMAN OF THE BOARD AND CEO
(Firm, Farmer, Homeowner, etc.) COOPER/T.SMITH STEVEDORING (251) 431-6100 CASE # 06022	Address 118 NORTH ROYAL STREET (36602-3603) P.O. BOX 1566 MOBILE, ALABAMA 36633

APR 2006
RECEIVED
PESTICIDE
MANAGEMENT
AGRI. & IND.

Reason for Inspection:

1. ☒ Compliance with Chapter 27 & 28, Title 2, **Code of Alabama (1975)** and Chapter 80-1-13, 80-10-9, **Alabama Administrative Code**.
2. ☐ For the purpose of inspecting sites where pesticides are being used or have been used to collect data on the use of pesticides and to determine whether pesticides are or have been used consistent with their labeling.
3. ☐ For the purpose of inspecting and obtaining samples of any pesticides or devices packaged, labeled, and released for shipment, and samples of any containers or labeling for such pesticides or devices in places where pesticides or devices are held for distribution or sales. FIFRA Sec. 9(a) and 12(a)(2)(B)).
4. ☒ For the purpose of inspecting and obtaining copies of those records specified in **FIFRA** Section 8 and 40 CFR Part 169 (Sec. 8 & 12(a)(2)(B)).
5. ☐ To inspect and obtain copies of records regarding sale, distribution, or disposal of pesticides and/or containers including labels, labeling and literature.
6. ☒ Violation suspected: IMPORT AND EXPORT OF UNREGISTERED PESTICIDE

PRODUCTS BY LEIGH ALLEN, d.b.a., WOODLAND SPECIALISTS, LLC. - SELMA, ALABAMA.



Signature of Inspector

ACPS #0101

Title

Authority for conducting inspection contained in Title 2, Code of Alabama (1975 and/or regulations promulgated thereunder.

334-874 3948

DEPARTMENT OF THE TREASURY UNITED STATES CUSTOMS SERVICE NOTICE OF PENALTY OR LIQUIDATED DAMAGES INCURRED AND DEMAND FOR PAYMENT 19 USC 1618, 19 USC 1623		Case Number 2005190420004801 Port Name and Code 1904 BIRMINGHAM. AL Investigation File No.
TO: INTERNATIONAL FIDELITY INS CO C/O INT'L BOND & MARINE BKGE TWO HUDSON PLACE, 4TH FLOOR HOBOKEN, NJ 07030 ID: 427198203		TEAM NUMBER: 502
DEMAND IS HEREBY MADE FOR PAYMENT OF \$ 3,185.00, representing <input type="checkbox"/> Penalties or <input checked="" type="checkbox"/> Liquidated Damages assessed against you for violation of law or regulation, or breach of bond, as set forth below: TIB NUMBER: AM304087035 TIB ENTERED: 06/25/2004 IMPORTED: 06/03/2004 EXPORT/DESTRUCTION REQUIRED BY: 06/03/2005 MERCHANDISE DESCRIPTION: METSULFURON METHYL 60 PERCENT WDG, 1000 KGS PACKED IN 40 DRU LIQUIDATED DAMAGES HAVE BEEN COMPUTED AT TWICE THE DUTY DUE FAILURE TO EXPORT OR DESTROY MERCHANDISE IN ACCORDANCE WITH THE TERMS AND CONDITIONS OF THE TEMPORARY IMPORTATION BOND. IN ACCORDANCE WITH PART 172 OF THE CUSTOMS REGULATIONS, YOU MAY: NO RELIEF GRANTED PRINCIPAL.		
LAW OR REGULATION VIOLATED		BOND BREACHED
19CFR10.39(D)(1)		BOND TYPE: SINGLE TRANSACTION BOND # 08703
DESCRIPTION OF BOND (If any)	Form Number	Amount \$ 27,685
Name and Address of Principal on Bond		Date 06/22/2004
LEIGH B. ALLEN 45 BERKELEY CIRCLE, HANGAR 209, SELMA, AL 36701 INTERNATIONAL FIDELITY INS CO C/O INT'L BOND & MARINE BKGE, TWO HUDSON PLACE, 4TH FLOOR, HOBOKEN, NJ 421		Surety Identification No.
If you feel there are extenuating circumstances, you have the right to object to the above action. Your petition should explain why you should not be penalized for the cited violation. Write the petition as a letter or in legal form; submit in (duplicate) (triplicate), addressed to the Commissioner of Customs, and forward to the FP&F Officer at		
CBP/FP&F OFFICE, PO BOX 2742, MOBILE, AL 36652 Unless the amount herein demanded is paid or a petition for relief is filed with the FP&F Officer within the indicated time limit, further action will be taken in connection with your bond or the matter will be referred to the United States Attorney.		TIME LIMIT FOR PAYMENT OR FILING PETITION FOR RELIEF (Days from the date of this Notice) 60
Signature ELOISE DUFF	Title FP&F OFFICER 251-441-5102	Date 09/26/2005

Customs Form 5955A (08/00)